

ESTTA Tracking number: **ESTTA440016**

Filing date: **11/08/2011**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91181448
Party	Defendant Patriot Guard Riders, Inc.
Correspondence Address	JAMES A O'MALLEY CLARK HILL PLC 150 N MICHIGAN AVENUE, SUITE 2700 CHICAGO, IL 60601 UNITED STATES JOMalley@clarkhill.com, mkitz@clarkhill.com
Submission	Testimony For Defendant
Filer's Name	James A. O'Malley
Filer's e-mail	jomalley@clarkhill.com, mkitz@clarkhill.com
Signature	/James A. O'Malley/
Date	11/08/2011
Attachments	Applicant's Notice of Filing of Testimony Depositions and Exhibits.pdf (2 pages) (77626 bytes) William Harold Richart, II - Executed Testimony Deposition.pdf (144 pages) (6529397 bytes) Jason Duane Wallin - Executed Testimony Deposition.pdf (138 pages) (4774673 bytes) Kurt Allen Mayer - Executed Testimony Deposition.pdf (150 pages) (5841776 bytes) Bonnie Ruth Perry - Executed (Corrected) Testimony Deposition.pdf (84 pages) (3117159 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,)	
)	
Opposer,)	
)	Opposition No. 91181448
v.)	
)	
PATRIOT GUARD RIDERS, INC.,)	
)	
Applicant.)	


**APPLICANT'S NOTICE OF FILING OF TESTIMONY DEPOSITIONS AND EXHIBITS
PURSUANT TO 37 CFR §2.125**

Applicant, Patriot Guard Riders, Inc., hereby submits this Notice of Filing of Testimony Depositions and Exhibits Pursuant to 37 CFR §2.125.

This Notice of Filing includes the following testimony depositions and exhibits:

1. William Harold Richart, II, taken on August 1, 2011, and including Exhibits 2-9;
2. Jason Duane Wallin, taken on August 1, 2011, and including Exhibits 10-23;
3. Kurt Allen Mayer, taken on August 2, 2011, and including Exhibits 24-34; and
4. Bonnie Ruth Perry (corrected), taken on August 2, 2011, and including Exhibits 6, 7, 33 and 35-37.

Date: 11/8/11

By: 
James A. O'Malley
CLARK HILL PLC
150 N. Michigan Avenue
Suite 2700
Chicago, Illinois 60601
Tel: 312-985-5562
Fax: (312) 985-5962
E-mail: jomalley@clarkhill.com

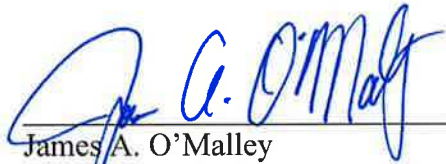
Attorney for Applicant, Patriot Guard Riders, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of November, 2011, a true and correct copy of the foregoing **APPLICANT'S NOTICE OF FILING OF TESTIMONY DEPOSITIONS AND EXHIBITS PURSUANT TO 37 CFR §2.125** (including copies of the certified signed deposition transcripts referenced therein) was sent first class mail, postage prepaid, to:

Rachel Blue
McAfee & Taft
900 Mapco Plaza
1717 S. Boulder Ave.
Tulsa, Oklahoma 74119
Tel: (918) 587-0000
Fax: (918) 599-9317
E-mail: Rachel.Blue@mcafeetaft.com

Attorney for Opposer, Jeff Brown



James A. O'Malley
CLARK HILL PLC
150 N. Michigan Avenue
Suite 2700
Chicago, Illinois 60601
Tel: 312-985-5562
Fax: (312) 985-5962
E-mail: jomalley@clarkhill.com

Attorney for Applicant, Patriot Guard Riders, Inc.

IN THE UNITED STATES
PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

JEFF BROWN,

Opposer,

vs.

Opposition
No. 91181448

PATRIOT GUARD RIDERS, INC.,

Applicant.

The deposition of WILLIAM HAROLD RICHART
II, taken in the above-entitled cause, before
SUZANNE THALJI, Certified Shorthand Reporter of
the State of Illinois, on August 1, 2011, at
150 North Michigan Avenue, Suite 2700, Chicago,
Illinois, pursuant to notice, commencing at
9:30 a.m.

REPORTED BY: SUZANNE THALJI, CSR, RMR, CRR
LICENSE NO.: 084-002337
JOB NO.: 168210A

1 APPEARANCES:

2 McAFEE & TAFT, by
3 MS. JENNA PERRY
4 1717 South Boulder Avenue, Suite 900
5 Tulsa, Oklahoma 74119
(918) 587-0000
jenna.perry@mcafeetaft.com

6 Representing the Opposer;

7 CLARK HILL PLC, by
8 MR. JAMES A. O'MALLEY
9 MR. DAVID J. MARR
10 150 North Michigan Avenue, Suite 2700
Chicago, Illinois 60601
(312) 985-5900
(312) 985-5558
jomalley@clarkhill.com
dmarr@clarkhill.com

11 Representing the Applicant.
12
13
14
15
16
17
18
19
20
21
22
23
24

1

I N D E X

2

WITNESS

3

WILLIAM HAROLD RICHART II

4

EXAMINED BY

PAGE

5

MR. O'MALLEY

4

6

MS. PERRY

47

7

APPLICANT'S EXHIBITS

8

NUMBER

DESCRIPTION

PAGE

9

Exhibit 2

PGR Store Invoice 2274,
PGR 000536

11

10

Exhibit 3

Patriot Guard Riders Forum,
6/22/06-6/23/06, PGR 006430-31

13

11

12

Exhibit 4

PGR FAQ, 9/2/06,
PGR 000138-161

16

13

Exhibit 5

PGR FAQ, 10/22/06,
PGR 000162-185

16

14

15

Exhibit 6

Jeff's Final Corner, 11/7/06
BROWN009964

32

16

Exhibit 7

Patriot Guard Riders Forum,
11/21/06, PGR 002174-2177

33

17

18

Exhibit 8

Various emails, dated 9/25/07
and 10/1/07-10/4/07,
PGR 003043-3050

36

19

20

Exhibit 9

Various emails, dated 12/21/08, 43
12/22/08, 2/28/09, 5/2/10,

21

22

23

24

1 WILLIAM HAROLD RICHART II,
2 having been first duly sworn, was examined and
3 testified as follows:

4 DIRECT EXAMINATION

5 BY MR. O'MALLEY:

6 Q. Okay. So, Bill, you have had your
7 deposition taken before?

8 A. Yes, I have.

9 Q. And so you know how a deposition works?

10 A. In layman's terms, yes.

11 Q. Okay. I am just going to give you some
12 reminders about that. I am going to ask you a
13 bunch of questions relating to this trademark
14 opposition. You will have a chance to answer
15 them under oath. The other lawyer here,
16 Ms. Perry, is also allowed to ask you questions
17 if she so chooses.

18 The court reporter is taking everything
19 down, will prepare a written record of
20 everything that's said, which is referred to as
21 a transcript. If you want, you can review your
22 transcript somewhere down the line to check to
23 make sure it's accurate and to make any
24 corrections before signing it.

1 Do you understand that?

2 A. Yes, I do.

3 Q. Okay. It's very important that you
4 understand the questions and give accurate
5 answers. If there is anything that you don't
6 understand or any that you don't know or aren't
7 sure of, let us know, okay?

8 A. Yes.

9 Q. Please be sure to verbalize your
10 answers to make it easier for the court reporter
11 to understand you.

12 Are you feeling good this morning?

13 A. Okay.

14 Q. Okay. Any medications that would
15 impact your ability to get through the
16 deposition?

17 A. I don't believe so.

18 Q. No? Okay. Can you state your full
19 legal name?

20 A. William Harold Richart II.

21 Q. Can you spell that?

22 A. R-i-c-h-a-r-t as in Tom.

23 Q. Okay. Richart. And your address?

24 A. 100 Southeast Crestwood, that's one

1 wood, Lee's Summit, Missouri.

2 Q. Okay. And where do you work?

3 A. Hayes-Lemmerz International,
4 Incorporated.

5 Q. Okay. And can you give me a little bit
6 of your educational background?

7 A. Went through various schools in the
8 military and since then I have completed 152
9 hours of higher education. I have three
10 associate degrees.

11 Q. In?

12 A. One is in computer drafting. One is in
13 machine tool and professional certification and
14 welding technologies.

15 Q. Okay. And you said you were in the
16 military. You had education. Can you describe
17 your military background?

18 A. I was 11 years in the military, 81150
19 skill level, which is -- I have been through the
20 tech school, tech school, different tech schools
21 for the military. I don't really know how to
22 explain them in civilian terms.

23 Q. Okay, that's fine. And that was how
24 long ago?

1 A. I got out of the military in 1994.

2 Q. 1994, okay. Are you known by any other
3 names or nicknames?

4 A. In the Patriot Guard Riders, my ride
5 name, road name is Whirlwind.

6 MS. PERRY: Can you say that again? I'm
7 sorry.

8 THE WITNESS: Whirlwind.

9 BY MR. O'MALLEY:

10 Q. Do you want to spell it?

11 A. I can.

12 Q. Please, yes.

13 A. W-h-i-r-l-w-i-n-d.

14 Q. Okay. And do you have any email
15 addresses -- what email addresses have you used
16 in the last five, six years or so?

17 A. Just for related things or --

18 Q. For PGR related items.

19 A. Whr2nd@patriotguard.org, whr2nd@me.com,
20 just m-e, and I have received some mails at my
21 work address. I have a question on that.

22 Q. Okay. I am not asking for that
23 address.

24 A. Okay.

1 Q. Can you tell me how you first came to
2 know about the Patriot Guard Riders?

3 A. I believe I saw a news story about
4 protestors at a funeral and went online and
5 typed in what I saw, the name, and went to the
6 site and read about it.

7 Q. Okay. What time frame would that be
8 about?

9 A. Late February, early March of 2006.

10 Q. Okay. And when you went to that
11 website, is that the time when you joined
12 Patriot Guard Riders or did that occur at some
13 later date?

14 A. I think I looked at it that night, and
15 the next morning I joined. I am not a big
16 joiner of organizations and all that, but it was
17 something I thought had a good purpose.

18 Q. Okay. And how would you go about
19 joining?

20 A. Registering on the website at
21 patriotguard.org.

22 Q. Registering, okay. So once you became
23 a member or a volunteer, what kind of activities
24 did you do in the PGR? And let's kind of go

1 through in order from the time when you joined
2 to present.

3 A. I think the very first activity I did
4 with Patriot Guard Riders in Missouri was we
5 attended a signing at the capitol building of
6 the ban law for protests in Missouri. The next
7 time I rode with the PGR was for a funeral in
8 Anderson, Missouri. It would have been in
9 March, I believe, for Christopher Marion,
10 Pfc Christopher Marion.

11 I became a ride captain right away,
12 which meant, you know, at the next mission that
13 I went to, I actually was the organizer for the
14 event. I contacted the family, the military,
15 local law enforcement, funeral home, and made
16 the arrangements for the ride.

17 Q. Okay. And then after that did you ever
18 take on more responsibility?

19 A. Yes. Within probably three months of
20 my joining, I volunteered to be one of the site
21 moderator teams, had access to the site to post
22 missions, to remove inflammatory comments, to
23 enforce the use terms of the use of the site.
24 Probably in August I believe I became the

1 Missouri state captain in addition, and I held
2 that position until I joined the board of
3 directors in 2007. In between -- sorry. That
4 kind of got off track.

5 Q. Okay.

6 A. While I was Missouri state captain,
7 I -- I am trying to think of the order that I
8 did it in. I became the national forum
9 administrator, the head of the moderator team,
10 head moderator, we call it, in October,
11 November, sometime between September and
12 November of '06. Not too long after that, maybe
13 another eight or nine months, we created the
14 position director of operations, and I was
15 actually -- the position was created for me to
16 kind of oversee the daily operations and be the
17 buffer between the board and everything else,
18 handled decisions for them, keep their plate,
19 you know, less congested.

20 In September of 2000 -- make sure I got
21 my years right. I don't remember if it was 2007
22 or 2008 now. 2006 was that -- it would have
23 been 2007. I was elected to the board of
24 directors. My initial position was vice

1 president, and I became the president in April
2 or so of the following year, and I have remained
3 president ever since.

4 MR. O'MALLEY: Okay. Sounds good. Okay. I
5 would like to introduce the first exhibit, and I
6 am going to introduce this as Applicant's
7 Exhibit No. 2. I plan on using some of the same
8 exhibits over, and so rather than separating
9 them out between that, I am going to do it as
10 No. 2.

11 Unfortunately, during the depositions
12 of Awtry and Brown, I have two Defendant's
13 Exhibits No. 1, but I think we can -- if and
14 when we need to use those, we can separate those
15 out, but from here on out, I will go consecutive
16 if that's okay with you.

17 MS. PERRY: Okay.

18 MR. O'MALLEY: Does that make sense? Okay.

19 (Applicant's Exhibit 2 was
20 marked for identification.)

21 BY MR. O'MALLEY:

22 Q. Can you please turn to the second page
23 here and take a look at this document. Are you
24 familiar with this document?

1 A. Yes, I am.

2 MR. O'MALLEY: Okay. On the bottom there's a
3 sticker that says Respondent's Exhibit 10. I
4 just want to note that that document was used
5 during the discovery deposition of Jeff Brown
6 and also uses the Bates stamping PGR 000536.

7 Q. Can you tell me what this document is,
8 please?

9 A. PGR store invoice made out to myself
10 for a purchase that I made from the PGR store.

11 Q. Okay. And when did you make that
12 purchase?

13 A. The date on the invoice is 3/18, 2006.

14 Q. Okay. So that was soon after you
15 became a member?

16 A. Within the first couple weeks, it would
17 have to be.

18 Q. Okay. How did you go about making this
19 purchase?

20 A. I went to the PGR's website. There was
21 a link there that said -- you know, for the PGR
22 store, went in, picked the items I wanted and --

23 Q. Okay. And then this invoice that you
24 got back here, does it have any other

1 information telling you about who is operating
2 the store?

3 A. It says PGR store at patriotguard.org
4 website. The other address also says PGR on it.

5 Q. Okay. Anything to give any indication
6 to you that Jeff Brown was running the store?

7 A. It just says -- everything on it says
8 PGR.

9 MR. O'MALLEY: Okay. Thank you. This is
10 Applicant's Exhibit No. 3 here.

11 (Applicant's Exhibit 3 was
12 marked for identification.)

13 BY MR. O'MALLEY:

14 Q. Can you take a look at this document
15 and tell me what it is?

16 A. It appears to be a copy of one of our
17 forums. From the header it's the state captains
18 area forums.

19 Q. And is there a date on this?

20 A. Date of the post is 22 June 2006.

21 Q. Okay. And who made this post?

22 A. It would appear to be Jeff Brown.

23 Q. Okay. And it says Twister on that?

24 A. Yes.

1 Q. Is that his road name or ride name,
2 however it is characterized?

3 A. Yes, it is. That's his picture too.

4 Q. Okay. That's him. All right. Good to
5 know.

6 Can you turn to the second page there,
7 which is PGR 006431. Can you read to me the
8 first full paragraph in Jeff's post?

9 A. "The PGR name, logo, 'Riding with
10 Respect' and 'Scooter Sissy' are all trademarks.
11 Please do not use them without permission."

12 Want me to read the whole paragraph?

13 Q. Yes.

14 A. Okay. Sorry. "Additionally, please
15 don't think I'm just being a jerk when I have to
16 say 'no.' Just so you know, in addition to
17 furthering the organization through a uniform
18 image, there are some very sound legal reasons
19 why permission may not be granted. Our
20 attorneys have advised us if we ever have to go
21 to court to enforce our trademarks, and the
22 defense attorney can cite other instances where
23 we did not enforce our trademarks, it will
24 damage our case substantially.

1 "Please pass this information on to
2 your RC's and members.

3 "Thanks, Jeff."

4 Q. Okay. When you are reading this, are
5 there any impressions that you get from reading
6 this?

7 MS. PERRY: Objection as to form. Please
8 restate.

9 BY MR. O'MALLEY:

10 Q. Do you have any impression from reading
11 this?

12 A. That PGR's logos and marks are
13 protected. It's for the organization, and so
14 everything on there says that -- our attorneys,
15 you know, PGR's attorneys -- I am reading it as
16 I am reviewing.

17 Q. Sure.

18 A. It talks about enforce our trademarks,
19 you know. I read that as saying, you know, no
20 one can use them without permission of the PGR.

21 MR. O'MALLEY: Okay. Thank you. I am
22 actually going to introduce two documents here
23 in a row or together, I should say.

24

1 (Applicant's Exhibits 4 and 5 were
2 marked for identification.)

3 BY MR. O'MALLEY:

4 Q. Okay. Applicant's Exhibit No. 4 is
5 Bates stamped PGR 000138 to PGR 000161, and
6 Applicant's Exhibit No. 5 is Bates stamped
7 PGR 000162 to PGR 000185. If we can look at
8 these, both of these are printouts from the PGR
9 website and entitled "PGR FAQ." One has the
10 date Saturday, September 2, 2006. That is
11 Applicant's Exhibit No. 4, and the other is
12 dated Sunday, October 22, 2006. That's
13 Applicant's Exhibit 5. These documents contain
14 basically the same information here, but I just
15 want to go through them so we can see it.

16 MS. PERRY: Question?

17 MR. O'MALLEY: Yes.

18 MS. PERRY: There are two dates on each of
19 these. Can you explain that?

20 MR. O'MALLEY: Are you referring to the dates
21 on the bottom?

22 MS. PERRY: Correct.

23 MR. O'MALLEY: Okay. The 5/1/2008s are the
24 dates when they were printed from the web. Does

1 that answer your question?

2 MS. PERRY: Yes.

3 MR. O'MALLEY: Okay.

4 Q. In connection with your duties at the
5 PGR, were you aware of this PGR FAQ section?

6 A. Absolutely. I have done updates to it
7 myself on occasion.

8 Q. How would one get to these pages in
9 order to access it?

10 A. Well, on the home page -- on all the
11 pages we have a navigation bar, and it's
12 actually showed on here on the side our
13 navigation where it has a link for PGR FAQ.

14 Q. So that would bring you to this page,
15 and what's on this page in general?

16 A. Frequently asked questions, general
17 information on the PGR. A lot of members, when
18 they join an organization, there's a lot of
19 common questions people ask over and over again.
20 It's easier to put them on the forum where
21 they're available.

22 Q. Okay. Can you first turn to the second
23 page, PGR 000139, and can you read for me the
24 first sentence under the section that says "Are

1 there any dues or membership fees?" I'm sorry,
2 the first two sentences.

3 A. "No, membership is free. PGR is funded
4 through purchases made from the PGR store,
5 public donations, member donations and member
6 businesses who donate."

7 Q. Okay. So when you read this, is there
8 a differentiation in your mind from the PGR
9 store and public donations?

10 A. It has it listed as a separate
11 category.

12 Q. Is there a differentiation from PGR
13 store and member donations?

14 A. Same. It's listed as separate.

15 Q. And from the PGR store and member
16 businesses?

17 A. Absolutely. Member businesses weren't
18 ever treated the same as the store.

19 Q. Okay. And then it says that the PGR is
20 funded through purchases made from the PGR
21 store. What does that mean to you?

22 A. That's how the PGR manages its
23 operating budget, selling of goods that are
24 marked with the PGR's logo to fund the website,

1 plaques, all of the operations.

2 Q. Okay. Can you turn the page here to
3 PGR 000140. Can you please read the statement
4 made under "I own a business that might be of
5 interest to PGR members. Can it be listed on
6 the website?"

7 A. "Yes, it can. Send an email to
8 Hardbite@patriotguard.org or
9 Schmidtrock@patriotguard.org with the URL and a
10 graphic from your site including any information
11 you want posted. They will get it posted to the
12 Links section in the Navigation Bar on the Home
13 Page."

14 Q. Okay. So what's happening here?

15 MS. PERRY: Objection as to form.

16 BY MR. O'MALLEY:

17 Q. What is the basis behind this
18 statement?

19 A. It was a place for people who --

20 MS. PERRY: I am going to object to that as
21 well. It calls for speculation. It isn't
22 clear. Can you restate the question?

23 MR. O'MALLEY: Sure.

24 MS. PERRY: I'm sorry. Restate the question.

1 MR. O'MALLEY: Sure.

2 Q. Based off of the sentences that you
3 read, what is your understanding of the basis
4 behind it?

5 A. That members who have a business
6 that -- or items that PGR might be interested
7 in, I would assume motorcycles, whatever, can
8 send in their URL and graphic to the site and
9 have it listed as a member business.

10 Q. Okay.

11 A. And that the people that will post that
12 information are volunteers on the site. I know
13 who both of them are.

14 Q. And it says here that this will get
15 posted to the links section in the navigation
16 bar on the home page. Is this the same thing
17 you were talking about as to how -- one place
18 you would get to the PGR FAQ section?

19 A. Yes. It even shows that on that first
20 page under the navigation. There's a separate
21 tag there for links, and there is probably a
22 subdivision underneath.

23 Q. Okay. Sounds good. Thank you. Can
24 you turn to the next page, PGR 000141. There is

1 a category here called a "PGR Back Patch."
2 Second line down, there is a sentence that says,
3 "We do not earn this patch but purchase it from
4 our store."

5 What store is that?

6 A. The PGR store.

7 Q. Okay. What is a back patch?

8 A. There's a couple of interpretations.

9 To be as brief as possible, when it talks about
10 earning, at some hardcore motorcycle clubs, they
11 do a probationary period to earn a patch. The
12 PGR back patch, it's the logo of the PGR.
13 People wear it to show their membership and
14 support.

15 Q. Okay. When the PGR first started up,
16 was there a PGR back patch?

17 A. No. Actually, when it came out, it was
18 kind of shocking to everyone, when it first
19 showed up, because the perception between the
20 two, we were -- it was always the --

21 MS. PERRY: I am going to object to this
22 question because he doesn't have personal
23 knowledge of that.

24 THE WITNESS: I was there when the first one

1 showed up. The first time anyone saw the back
2 patch was at the 2006 gathering of the guard in
3 Claremore, Oklahoma. I was an attendee there,
4 got the T-shirt.

5 Q. What time period is that?

6 A. Would have been June or -- I'm sorry.
7 It was July 2006. I know it because I left
8 early to be with my family on 4th of July. I
9 left on the Saturday, and it ran through Sunday,
10 so first week of July 2006, I believe.

11 Q. Okay. Tell me again what was the
12 reaction when the PGR back patch came out at the
13 gathering of the guard.

14 A. To be honest, kind of a what the hell.

15 Q. Okay.

16 A. People who showed up were from the
17 Dixie region. I believe it was Dinky Dau and Ed
18 Baker and a couple others that had made the
19 patch down in that region.

20 Q. Okay.

21 A. There were a lot of people -- what's
22 the deal, you know. We are not a club, and we
23 don't want to appear as a club. We always said
24 this was never going to happen. That was the

1 common perception of the PGR.

2 Q. And were these back patches being sold?

3 A. I was told, yes, because I asked about
4 the --

5 Q. Okay. Was Jeff Brown aware of this?

6 A. I don't believe --

7 MS. PERRY: Will you please state the
8 question more clearly. Objection on that one.

9 MR. O'MALLEY: Sure.

10 Q. Was Jeff Brown at the gathering of the
11 guard in 2006?

12 A. Yes, he was, and I believe I asked him
13 about it personally to be honest.

14 Q. I'm sorry. Asked him about what?

15 A. The patch, because there had been such
16 a big deal about not becoming -- I was familiar
17 with Jeff Brown by this point. We had met at
18 one of my first rides, and we talked on the
19 phone quite a bit in between.

20 Q. Okay.

21 A. So I was familiar with Jeff, and I
22 spoke to him about it and lots of other people.
23 I am trying to make sure I recall the specifics.
24 I believe I was told that they had made these

1 down there. They were selling, and it was going
2 to the PGR store afterwards.

3 Q. What was going to the PGR store?

4 A. The back patch was going to be
5 available in the PGR store after that.

6 Q. Okay. Did Jeff Brown have any reaction
7 to seeing these people wearing a back patch?

8 MS. PERRY: Objection. That calls for
9 speculation as well.

10 MR. O'MALLEY: He was there and --

11 A. I think he was as surprised as everyone
12 else.

13 Q. Okay.

14 A. But I also know that he had discussion
15 with them about that and allowing them to sell
16 it.

17 Q. He allowed them to sell it?

18 A. Yes.

19 Q. Okay. Thank you. Can we turn to the
20 next page, PGR 000142.

21 A. Wait a second. On my previous
22 answer --

23 Q. Yes.

24 MR. MARR: Do you want it read back?

1 THE WITNESS: Please.

2 (Answer read.)

3 A. I guess on reflection I am not sure I
4 can say he was surprised. I know there was a
5 lot of consternation -- is that a good word? --
6 about it, and I know he gave them, you know, the
7 permission to sell because they had made them.
8 Whether or not he knew prior, I can't say he
9 didn't or if he had talked about it. I really
10 can't say with certainty. He didn't -- by the
11 time I saw him, I guess consternation was
12 probably more than surprise.

13 BY MR. O'MALLEY:

14 Q. Okay. Complete?

15 A. Yeah, I think so.

16 Q. All right.

17 A. I am trying to remember back. It's
18 been a while.

19 Q. No problem. Can you turn, if you
20 haven't done already, to PGR 000142. Okay.
21 There is a section there that says "Since I am a
22 member can I use the PGR logo and name?"

23 Can you read what's underneath that for
24 me?

1 A. "The PGR logo and name is copyrighted
2 and restricted to specific use. Anyone wishing
3 to reproduce the logo or name for personal
4 and/or business use in graphics of any form MUST
5 receive permission from National, contact Jeff
6 'Twister' Brown, jbrown@patriotguard.org before
7 using it."

8 Q. Okay. Upon reading this, what is your
9 impression of who owns the trademarks or -- I'm
10 sorry. Let me rephrase that.

11 Upon your reading of this, what is your
12 impression of who owns the PGR logo and name?

13 A. The PGR, you got to get permission from
14 national, contact Jeff Brown who is our director
15 at the patriotguard.org address, the
16 organization.

17 Q. Okay. Thank you. The next part down
18 it says "Where do I purchase PGR items?" Can
19 you read to me what it says underneath there?

20 A. "The link to the PGR store is located
21 in the Navigation Bar on the left-hand side of
22 the Home Page. You will need to create a
23 separate log-in from the one you use to log in
24 to the PGR main site. Once you have entered the

1 store please take the time to familiarize
2 yourself with the policies and procedures of the
3 store. Many of the questions you may have about
4 the store will be answered there."

5 Q. Okay. So the link to the PGR store is
6 located in the navigation bar. That is again
7 the same place as we've talked earlier where
8 there's a link section, a PGR FAQ section,
9 correct?

10 A. Yes.

11 Q. Okay. And then can you compare this --
12 go back two pages to PGR 000140, the part where
13 it says, "I own a business that might be of
14 interest to PGR members. Can it be listed on
15 the website?" So is it your understanding from
16 reading the statement on PGR 000142 as to
17 whether the PGR store is owned by a member of
18 the PGR?

19 A. Clearly not. It's on a separate tag
20 that says PGR store. Member businesses are
21 always in a separated form or separated link.

22 Q. Okay. Thank you. Can you turn to the
23 next page, PGR 000143. It says "Regarding the
24 PGR online store." Can you go through and read

1 that section for me, please?

2 A. Both paragraphs?

3 Q. Yes, please.

4 A. "A number of people have asked if they
5 or a friend can duplicate some of our stuff for
6 free to help the cause. Our PGR name and logo
7 is copyrighted for a reason. The revenue
8 generated from the sale of PGR products enables
9 us to operate this site and continue to grow the
10 organization without any dues, donations or
11 fees. We also have other plans down the road.

12 "All associations have their own stores
13 (VFW, AL," American Legion, and Run for the
14 Wall, "RFTW, etc.) and do not allow
15 reproductions for the same reasons. We've also
16 tried to keep our pricing lower than comparable
17 products through other associations. I hope you
18 understand and support this policy."

19 Q. What is your understanding of the PGR
20 online store and how it works based off of a
21 reading of this?

22 A. Again, that, you know, we've
23 copyrighted the name and logo for use for the
24 organization. The sale of those items with

1 those marks is how the PGR funds itself,
2 operates. All the associations such as, you
3 know, other groups and these groups listed all
4 have similar functions. They're veteran
5 support, military support, and all these
6 organizations have their stores also and don't
7 allow any outside use for the same reasons, and
8 it references, you know, comparable products
9 through other associations below that.

10 Q. The next section, same page says "What
11 if I have an idea for an item for the store?"
12 Can you read what is stated underneath there?

13 A. "Suggestions for the PGR store can be
14 posted in the National Forums under the heading
15 Patriot Guard Store. Check the threads in that
16 Forum before you post. Your idea may have
17 already been suggested and the answer will be
18 there."

19 Q. Okay. So is it my understanding that
20 from this that there are forums on Patriot
21 Guard's web page and one of them is a Patriot
22 Guard store forum?

23 A. Yes.

24 Q. And people from that, members could

1 suggest --

2 MS. PERRY: Objection, leading.

3 MR. O'MALLEY: Okay.

4 Q. Can you tell me what is your

5 understanding from this statement?

6 A. Like I said, in a couple of my roles I
7 was the head admin. I, you know, posted forums
8 and made forums and all this. The PGR store had
9 a forum area with a couple different sections in
10 it for -- it was basically customer service for
11 the store. If people had questions on an order,
12 an item, delivery on something, you know,
13 shipping, if something hadn't showed up,
14 anything related to the store was answered there
15 through the PGR.

16 Q. Okay. Thank you very much.

17 A. I want to say one further thing.

18 Q. Yes, I'm sorry.

19 A. Member businesses were never the same
20 way. We would post a link. We didn't endorse
21 anything or really do discussion because we
22 don't recommend our members do anything, you
23 know. We don't take that responsibility on
24 whether or not somebody's got a good transaction

1 or a good company.

2 Q. Okay.

3 A. The PGR store was us.

4 MR. O'MALLEY: Okay. Thank you. Turning now
5 to Applicant's Exhibit No. 5, I can make this
6 statement -- we can go through them again, or I
7 can point to you where these same headings are
8 located on this exhibit, if you'd like. They're
9 essentially the same --

10 MR. MARR: You might want to go off the
11 record.

12 MR. O'MALLEY: Okay. Off the record.

13 (Discussion off the record.)

14 MR. O'MALLEY: Okay. Applicant's Exhibit
15 No. 5 I am going to make the statement is
16 essentially the same document as Applicant's
17 Exhibit No. 4. The only difference is the dates
18 of the documents. Applicant's Exhibit No. 4 was
19 dated September 2, 2006, and Applicant's Exhibit
20 No. 5 is dated October 22, 2006. But the
21 information that was just discussed can be found
22 in both documents, and rather than going through
23 them again to state the same things again, we
24 will just leave it at that.

1 (Applicant's Exhibit 6 was
2 marked for identification.)

3 BY MR. O'MALLEY:

4 Q. Okay. This is Applicant's Exhibit
5 No. 6, which was produced by Brown and
6 identified as BROWN009964. Can you tell me what
7 this document is? Are you familiar with it?

8 A. It's entitled "Jeff's Final Corner."
9 We have a link on the bottom right-hand side of
10 the home page. It's changed names a couple
11 times. It is an area for the president to post
12 in. It was Jeff's Corner. It was Snap's Shack,
13 and currently since I'm the president, it's just
14 called Board Talk, just referencing our board of
15 directors.

16 Q. Okay. So what is this document? Take
17 some time to read through it if you'd like.

18 A. This is the final corner where Jeff
19 Brown resigned from the PGR.

20 Q. And is there a date on this document?

21 A. It was posted Tuesday, November 7,
22 2006, at 8:42 a.m. by Jeff Brown, Twister.

23 Q. Okay. Can you read the last sentence
24 of the second paragraph, please? It's the fifth

1 line down is where it starts.

2 A. It starts with "The business"?

3 Q. Yes.

4 A. "The business structure of the store
5 has never been hidden and has been discussed 'ad
6 nausea,' but in an effort to belay any further
7 controversy that takes time and energy away from
8 our missions, I have chosen to step down and
9 close the PGR store after the current inventory
10 is depleted."

11 MR. O'MALLEY: Okay. Thank you. That's it.

12 (Applicant's Exhibit 7 was
13 marked for identification.)

14 BY MR. O'MALLEY:

15 Q. Okay. Applicant's Exhibit No. 7 was
16 produced by Patriot Guard Riders and is
17 identified as PGR 002174 to PGR 002177. Are you
18 familiar with this document, Bill?

19 A. Yes.

20 Q. Can you explain to me what it is?

21 A. Can I take a glance at it first for the
22 details?

23 Q. Sure.

24 A. It's letters to the president section.

1 It's a posting written by Snap, Bill Lines, who
2 became the -- who was the president of PGR at
3 that time. He took over after Jeff's
4 resignation as the president. He was elected to
5 be president, as posted by Waldo who was one of
6 the site admins.

7 MS. PERRY: Waldo?

8 THE WITNESS: That's the rider name. All it
9 says is Waldo.

10 MS. PERRY: Is that Jason Wallin?

11 MR. O'MALLEY: Yes.

12 THE WITNESS: Yes. I'm sorry. I was looking
13 at the front page.

14 BY MR. O'MALLEY:

15 Q. Can you turn to the second page of
16 this, please, and he says here at the top, "I
17 would like to address some topics with you and
18 the best way for my old mind is by the numbers.
19 So here goes." He has a number of listed items.
20 Can you read what No. 1 says, please?

21 A. "The PGR store; We are going to TRY and
22 have the new store up by New Years Eve. It will
23 sell all the items it does now and more. And
24 ALL profit will go to the PGR. We are going to

1 outsource this store so that no member will have
2 his hands on it. It will be overseen by a
3 committee of members."

4 Q. Okay. What is the purpose behind this
5 statement, if you know?

6 A. To explain that the PGR store is
7 ongoing. It's going to continue to support the
8 PGR in a new form.

9 Q. And he says there that all profit will
10 go to the PGR. Why does he make that statement,
11 if you know?

12 MS. PERRY: I am going to object. That's
13 speculation.

14 A. I think it's pretty clear, because we
15 found out previously that the other store
16 profits were being diverted to a person instead
17 of the organization.

18 BY MR. O'MALLEY:

19 Q. Who was that person?

20 A. Jeff Brown.

21 Q. Okay. Can you turn down to No. 3 and
22 let me know what that reads, please?

23 A. "We have received advice from our
24 attorney that we can retain and use our name and

1 logo without restraint. If you want a new logo,
2 let us know but we don't have to."

3 Q. Okay. Is there a reason why he's
4 making this statement?

5 MS. PERRY: Objection. That's also
6 speculative.

7 MR. O'MALLEY: You can answer if you know.

8 A. Again, it's pretty clear. As of
9 November, there were claims made by Jeff Brown
10 that he owned it individually. None of us were
11 lawyers, and I was head shed -- I was head forum
12 admin and I was in head shed at that time, but
13 there was a lot of discussion about doing it --
14 make sure everything we were doing was right
15 because the mission demands that we have
16 integrity in what we do. So we checked with
17 lawyers to see what the actual status of it was
18 versus claims that were being made. We had
19 found out that many of the statements by
20 Mr. Brown were not based in fact.

21 (Applicant's Exhibit 8 was
22 marked for identification.)

23 BY MR. O'MALLEY:

24 Q. Okay. Thank you. Applicant's Exhibit

1 No. 8 is a document that was produced by PGR
2 identified as PGR 003043 to PGR 003050. I first
3 want to turn your attention to PGR 003047 and
4 let you know that this is a document -- this one
5 page was identified as an exhibit both during
6 the deposition of Ronny Awtry and during the
7 deposition of Jeff Brown, but there are
8 obviously more to this email string here. Can
9 you please take a look at PGR 003047 and take a
10 look through it and tell me what's going on here
11 based off of this one page?

12 A. There was discussion and questioning
13 about what we thought -- what we had known and
14 acknowledged of the store and what later came to
15 be -- you know, it was being diverted to
16 personal profit and whether or not that violated
17 the bylaws of the PGR and the appropriate
18 regulations that oversee the nonprofits.

19 Q. And this one email here is dated
20 September 25, 2007. If you turn to PGR 003046,
21 the other email you can see is also dated
22 September 25, 2007. At that time there is a
23 person writing by the name of Ed Mueller. Who
24 is Ed Mueller, and what was his capacity, if

1 any, in the PGR at that time?

2 A. Ed Mueller was on the board of
3 directors. He came on the board of directors in
4 November of 2006.

5 Q. Okay.

6 A. He later became the president of the
7 board of directors.

8 Q. After this time period?

9 A. Actually, I think he was the president
10 at that time. No. I'm sorry. No. He was a
11 member's rep, which is the position I have. I'm
12 sorry. Snap was president at that time.

13 Q. Who is Jon Tatum who is also in these
14 emails?

15 A. Jon Tatum is an accountant. He is also
16 currently the PGR's accountant.

17 Q. Okay. Thank you.

18 A. Patriot Guard Riders, Incorporated.

19 Q. Sure. Okay. Can we fast forward to
20 PGR 003044. Do you have that page?

21 A. Yes.

22 Q. And there is an email from Ed Mueller
23 dated Wednesday, October 3, 2007, to exec. Who
24 or what is exec?

1 A. That's the address used for the board
2 of directors. It's a group address. Anything
3 you send to that, all the board members receive.

4 Q. Okay. And can you please read Ed's
5 statement from his email there that he is
6 sending to the board of directors?

7 A. "Here is a chain of e-mails between
8 myself, our accountant, and lawyer. Sorry, but
9 it will be necessary to read from the bottom up.
10 I have read the opinion of our attorney, and
11 personally feel he is not only way off base, but
12 trying to cover for Jeff Brown. I'm not easy
13 with his position, and would like your
14 thoughts."

15 Q. Can you finish? Sorry.

16 A. "Respects, Ed."

17 Q. All right. Can you forward to the next
18 page, PGR 003043, and there is what appears to
19 be a response to Ed's email from Ronny Awtry,
20 dated Wednesday, October 3, 2007. Was Ronny
21 Awtry on the board of directors at that time?

22 A. Yes. It says that in the signature
23 block. He is national treasurer.

24 Q. Okay. Thank you. Can you read through

1 Ronny's email to Ed as well as to the rest of
2 the board there, as he says, exec?

3 A. From the beginning?

4 Q. Yes, please.

5 A. "Ed, My thoughts would be that we were
6 told this a long time ago and that Jeff weaved a
7 helluva web. That said, I would point out some
8 very specific questions and not generalizations
9 that may be pertinent and easier for the
10 accountant, attorney to digest. It is very well
11 known you want Jeff's head on a platter, no
12 problems here with that. A better set of facts
13 and questions would serve us all better."

14 Keep going?

15 Q. Yes please.

16 A. "Such as, 1. The logo for the PGR was
17 designed and first used by the PGR on the PGR
18 website. Jeff created it while an officer of
19 the company. Is this a conflict of interest?

20 "2. Jeff stated that the funds from
21 the PGR store supported the PGR and expressed no
22 delineation between the two. Is that legal?
23 IRS acceptable?

24 "3. Jeff directly linked his store to

1 the Navigation bar of the official website with
2 no delineation. Is that legal? IRS acceptable?

3 "4. Jeff advertised the PGR as a
4 not-for profit the whole time to all parties who
5 would listen. We gained our Oklahoma NFP,"
6 not-for-profit, "status in 2-27-2006 through Tom
7 Winters office. If he stated we were a NFP,"
8 not-for-profit, "or 501c3 after that date was he
9 illegal or violating IRS rules?

10 "5. If the above happened while Jeff's
11 store was specifically linked in the PGR, Inc.
12 website navigation bar at that time giving
13 appearance that the PGR store" -- that's store --
14 "and the PGR were one in the same, was it
15 unlawful and against IRS rules?"

16 Q. Okay. Thank you. And then there is a
17 last email here, which is from Bill Richart,
18 yourself, dated Thursday, October 4, 2007, in
19 which you appear to be responding to Ronny's
20 email, which is also going to the rest of the
21 board. Is that correct?

22 A. Yes.

23 Q. Okay. Can you read your email on that?

24 A. "My thoughts would be covered in the

1 questions that Ronny added. From the attorney's
2 remarks, it would seem that he is unaware of the
3 overlap in events.

4 "One additional question for the
5 attorney; would Jeff have violated the fiduciary
6 responsibility of his position as Director by
7 removing that financial support of the
8 organization and denying us use of the
9 established logo when he stepped down, depriving
10 the organization of our primary means of funding
11 now that he was no longer Director?

12 "The old, if I can't be the boss I'll
13 take my money and go home tantrum..."

14 Q. Okay. So what is going on here with
15 Ed's email, Ronny's email and your email?

16 A. There was some opinion that, you know,
17 the accountant and the attorney, the information
18 they had didn't reflect accurately the dates and
19 specifics of what was actually going on. I'm
20 not sure they do to this date to be honest. As
21 I said, there was a lot of -- well, I think I
22 have answered the question.

23 Q. Okay. Thank you. That's it with
24 regard to that one.

1 MS. PERRY: Can we take a quick break?

2 MR. MARR: Sure.

3 MR. O'MALLEY: Sure.

4 (Recess taken.)

5 (Applicant's Exhibit 9 was

6 marked for identification.)

7 MR. O'MALLEY: Go back on the record, please.

8 Okay. I would like to introduce Applicant's
9 Exhibit No. 9. Okay. Applicant's Exhibit
10 No. 9, as you can see, has a copy of a sticker
11 on the bottom that says Exhibit 20. This was
12 Exhibit 20 to Jeff Brown's testimony deposition.
13 It was not a document that was produced to us
14 during discovery.

15 Q. Bill, can you please take a look
16 through this email and tell me what it is. Take
17 your time to read through it.

18 A. It is Jeff replying to a letter from --
19 I'm sorry. By Jeff I mean Mr. Brown replying to
20 a letter from Ronny Awtry where Ronny has asked
21 for permission to use PGR logos, marks on his
22 race car and trailer.

23 Q. Okay. And so he is asking Jeff for
24 permission?

1 A. Yes.

2 Q. Okay. Did Ronny Awtry make a similar
3 request to Patriot Guard Riders, Inc.?

4 A. Yes, he did.

5 Q. Can you tell me the circumstances
6 surrounding that?

7 A. Tom Hoffmann, one of the board members
8 at the time, was a good friend of Ronny's. I
9 believe Tom is -- one or two of Tom's children
10 may have worked for him at one point. They're
11 good friends. Tom brought the request for Ronny
12 to -- you know, Ronny contacted Tom as a member
13 of the board, and we voted in a conference call
14 to give him permission to.

15 Q. So Ronny is aware that this trademark
16 opposition is going on as to --

17 A. Absolutely.

18 Q. -- determine who is there, so in
19 essence I guess he is covering his bases?

20 MS. PERRY: Objection, leading.

21 A. It would appear that way.

22 MS. PERRY: You need to restate the question
23 in a different form.

24 MR. O'MALLEY: Sure.

1 BY MR. O'MALLEY:

2 Q. So what is Ronny doing then by asking
3 Jeff for permission and asking PGR for
4 permission?

5 MS. PERRY: And I object to that one based on
6 speculation, but he can answer.

7 A. It appears he has asked both sides for
8 the same permission.

9 BY MR. O'MALLEY:

10 Q. Okay. Thank you.

11 A. By sides I mean the PGR and Jeff Brown.

12 Q. All right. I have just a few follow-up
13 questions. Based on the exhibits that we looked
14 at here today, Applicant's Exhibits 2 through 9,
15 looking at all that, what is your understanding
16 of who owned the trademarks?

17 A. The Patriot Guard Riders, the
18 organization.

19 Q. Why?

20 A. They were the organization. First use
21 was with us. The first use was for our
22 services. The store was always represented as
23 being the funds of and controlled by the board.
24 All the decisions were discussed within. We

1 have always had a real strict view that we don't
2 profit from what we do. No member of the board
3 of directors has ever had an authorized
4 financial compensation for our time. We're
5 volunteers.

6 Q. Okay. Was it your understanding at all
7 that Jeff Brown owned any of the trademark
8 rights?

9 A. Never, until claims were made at the
10 end where he resigned.

11 Q. Okay. What is it -- I am not sure how
12 clearly it came out through all this, but what
13 is it that the PGR does?

14 A. The PGR organization shows respect for
15 our fallen soldiers and military. I will expand
16 it a little bit. We also do veteran
17 send-offs -- or veteran funerals, send-off of
18 troops and welcome home troops. It is about
19 supporting our American heroes, those that give
20 their lives to protect us.

21 Q. Okay. Did Jeff Brown as an individual,
22 as opposed to as a part of Patriot Guard Riders
23 organization or a leader of the Patriot Guard
24 Riders organization, ever use the trademarks on

1 his own behalf in performing those services?

2 A. No. The PGR is not about individuals.

3 It's one of our caveats that, you know, the
4 members make the mission happen. It's an
5 association of the people that are gathered
6 together for a purpose. It makes a difference.
7 There is no I in it.

8 MR. O'MALLEY: That's all the questions we
9 have.

10 MS. PERRY: Well, if I would have known
11 that --

12 MR. O'MALLEY: I wasn't going to question.
13 You can take another time here if you need to.

14 MS. PERRY: No, but I may need to take a
15 break before I finish the questions.

16 MR. O'MALLEY: Okay.

17 CROSS-EXAMINATION

18 BY MS. PERRY:

19 Q. Hi. I go by Jenna Perry, and I am the
20 attorney representing Jeff Brown in the
21 opposition, Opposition No. 91181448. I am going
22 to ask you a series of questions, and I would
23 like for you to answer them as fully and
24 truthfully as possible. You understand that you

1 are still under oath, correct?

2 A. Yes.

3 Q. So you understand that you have the
4 duty to answer each question truthfully and
5 fully, correct?

6 A. Yes, ma'am.

7 Q. If you don't understand a question,
8 will you tell me?

9 A. Certainly.

10 Q. Some of these questions may be
11 redundant, but I ask for your patience and
12 request that you answer each question truthfully
13 and fully as you did the first time.

14 A. Certainly.

15 Q. Okay. Let's begin. Have you ever been
16 convicted of a crime?

17 A. Traffic tickets.

18 Q. Anything else?

19 A. I once missed a court hearing for my
20 grass being too tall, but I don't think I was
21 convicted of anything, no.

22 Q. Okay. Have you ever been charged with
23 a crime?

24 A. Other than stated above, no.

1 Q. Okay. Have you spoken with
2 Mr. O'Malley or anyone else at this law firm
3 before the deposition today?

4 MR. O'MALLEY: I would like to object just to
5 the extent it calls for attorney-client
6 privilege.

7 MS. PERRY: I understand that.

8 A. I have discussed the case with the
9 attorneys numerous times.

10 Q. Have you spoken with Mr. O'Malley or
11 anyone else at this law firm this week about the
12 case?

13 A. Certainly.

14 Q. Please describe, not the content --

15 MR. O'MALLEY: Objection.

16 MS. PERRY: Not the content but the extent
17 of --

18 A. Discussing travel plans of getting the
19 other witnesses here and -- I don't know.
20 That's about it, I guess.

21 Q. How much time was devoted to discussing
22 the content of the deposition?

23 A. The deposition, very little. I have
24 also been in contact with them for other matters

1 in this last week.

2 Q. I am not talking about other matters.
3 We are talking about the content of this
4 deposition only. Within the past week, how much
5 time has been spent in conference with the
6 attorneys here at this firm regarding content of
7 this deposition?

8 A. I would guess less than an hour.

9 Q. How about in general through the
10 entirety of the opposition proceeding, how much
11 time has been spent discussing with the
12 attorneys the content of what is in this
13 deposition?

14 A. I am not sure what you meant by this
15 deposition. As in right now today?

16 Q. Well, the opposition proceeding in
17 general.

18 A. I couldn't speculate.

19 MR. O'MALLEY: Objection, speculation.

20 A. I couldn't begin to speculate. That's
21 been four years, quite a bit of time. I really
22 can't give you a -- if I guess, it would be a
23 pure number pulled out of the air.

24 BY MS. PERRY:

1 Q. What time did you arrive today for the
2 deposition?

3 A. A little after nine, right around nine.

4 Q. Did you look at any documents before
5 you came in today?

6 A. No.

7 Q. Have you looked at any documents in the
8 past week that were produced as exhibits today?

9 A. No. Without knowing the details of
10 everything in there, I looked at some stuff at
11 my house, but I don't remember specifically, you
12 know, looking at these documents.

13 Q. Did you speak to anyone besides
14 Mr. O'Malley or someone at this law firm when
15 preparing for your deposition today?

16 A. I'm sorry?

17 Q. Did you speak with anyone besides
18 Mr. O'Malley or individuals at this law firm --

19 A. No.

20 Q. -- before your deposition today?

21 A. No.

22 Q. What is your present position with PGR,
23 Inc.?

24 A. President of the board of directors.

1 Q. When did you become president of the
2 board of directors?

3 A. I think spring, early summer of 2008, I
4 believe. Yes.

5 Q. List all of your duties and
6 responsibilities as president of the board of
7 directors of PGR, Inc.

8 A. It's a pretty wide net. I'm a
9 representative of the PGR, head of the board of
10 directors. I also have responsibility for the
11 website teams. Every board member has different
12 outside responsibilities of areas we do, and
13 mine are website information teams, general
14 spokesman, draft policies over the legal issues.
15 I am also a ride captain in Missouri for doing
16 missions, but I haven't participated in a lot
17 lately with other things going on.

18 Q. If you are going to take legal action
19 against a person or entity, how would that be
20 decided in the PGR, Inc.?

21 A. By board of directors.

22 Q. Explain.

23 A. There would have to be a cause for an
24 action. We would discuss. We would get legal

1 advice I'm sure. None of us are lawyers, and we
2 would vote on taking a course of action.

3 Q. So if the PGR, Inc. were going to bring
4 action against an individual or entity, it would
5 be voted on prior to taking any legal action by
6 the board of directors?

7 MR. O'MALLEY: Objection, speculation and
8 goes beyond the scope of direct examination.

9 A. I can't speak on, you know, the exact
10 details, you know, before I was the president,
11 but that's always been my understanding, yes.

12 BY MS. PERRY:

13 Q. I am talking about while -- you are
14 president now.

15 A. Yes.

16 Q. If the PGR, Inc. were going to take
17 legal action, file a federal lawsuit against an
18 individual or entity, tell me how that would
19 occur.

20 A. As I just explained.

21 Q. Explain it again.

22 A. There would have to be some kind of a
23 cause. I don't -- we are talking about just now
24 currently?

1 Q. We are talking about now, since you
2 have been president.

3 A. We would get an opinion on our position
4 obviously, and the board would vote to take
5 action. Some things we don't have a lot of
6 choice in because -- by the regulations, if
7 somebody was representing us wrong or something
8 like that.

9 Q. Okay. And would the final decision
10 have to be voted on by the board prior to filing
11 suit?

12 A. Yes.

13 Q. Is it your opinion that Jeff Brown is
14 infringing the trademark of the PGR, Inc.?

15 A. Absolutely.

16 Q. In your presidency, in your time of
17 presidency for the PGR, Inc., has action ever
18 been filed against Jeff Brown for trademark
19 infringement?

20 A. No, it hasn't.

21 Q. Why not?

22 A. Under legal counsel the --

23 MR. O'MALLEY: Objection, calls for
24 attorney-client privilege as to the reasons why.

1 BY MS. PERRY:

2 Q. You can answer that question as it
3 doesn't apply to attorney-client privilege. If
4 you have been given --

5 MR. O'MALLEY: Bill, just be careful to not
6 divulge anything that's been said between us and
7 yourself.

8 THE WITNESS: Could you restate the question,
9 please.

10 (Record read as requested.)

11 MR. O'MALLEY: I would also like to continue
12 the objection that this is beyond the scope of
13 direct examination.

14 A. I'm not sure I can answer that without
15 going into attorney-client. I am obviously not
16 a trademark attorney. So my understanding has
17 come from my discussion with attorneys.

18 BY MS. PERRY:

19 Q. During your presidency has legal action
20 been taken against any entity or individual for
21 trademark infringement?

22 MR. O'MALLEY: Objection, goes beyond the
23 scope of direct.

24 A. Legal action?

1 BY MS. PERRY:

2 Q. Correct.

3 A. No.

4 Q. In your capacity as president of the
5 PGR, Inc., are you involved with licensing of
6 the PGR, Inc.'s trademarks?

7 MR. O'MALLEY: Objection, goes beyond the
8 scope of the direct.

9 A. Yes.

10 BY MS. PERRY:

11 Q. What are the requirements for use of
12 the trademarks -- let me rephrase.

13 According to the PGR, Inc., what are
14 the requirements for use of the mark, Patriot
15 Guard Riders, by those outside the PGR, Inc.?

16 MR. O'MALLEY: Same objection.

17 A. I am not exactly sure what you're
18 saying by those outside PGR, Inc.

19 BY MS. PERRY:

20 Q. Anyone who isn't a member of the board
21 of directors.

22 A. The PGR marks are held solely in
23 support of the PGR mission, association.

24 Q. If one of the members wanted to use

1 Patriot Guard Riders, according to the PGR,
2 Inc., what would be the process that they would
3 go through in order to use the mark for novelty
4 items, T-shirts, putting it on the motorcycle,
5 et cetera?

6 A. We don't typically allow anyone to do
7 anything for profit as an individual. Like I
8 said, anything that's -- anything that involves
9 money has to be for the PGR support only. It's
10 not for any outside purposes, definitely not for
11 individuals.

12 Q. So you would not license one of the
13 members of the PGR, Inc. to use the mark on any
14 items; is that correct?

15 A. That's not entirely correct, no,
16 nothing for commercial use. Ronny Awtry's
17 trailer, he requested it to be put on his
18 trailer, which was a noncommercial use, and that
19 was approved.

20 Q. Explain how that was approved.

21 MR. O'MALLEY: Asked and answered.

22 BY MS. PERRY:

23 Q. Explain how that was approved.

24 A. Ronny contacted Tom Hoffmann, who was a

1 board member, and Tom brought it before the
2 board. It was discussed that it was going to be
3 on his trailer. It was just representing the
4 PGR. It was not a commercial type thing. The
5 board voted on it.

6 Q. Does the PGR, Inc. have a written
7 license agreement for use of its marks?

8 A. Yes.

9 Q. What are the terms of the license
10 agreement?

11 A. That's a legal document. I couldn't
12 begin to off the top of my head tell you what's
13 in it. It was drafted by an attorney. I
14 really -- it is a legal document. I couldn't
15 begin to tell you the accurate representations
16 of it off the top of my head. I just couldn't
17 do it, not with any degree of certainty.

18 Q. When does the PGR, Inc. use that
19 document?

20 A. I'm sorry?

21 Q. When does the PGR, Inc. use the
22 document that you just referenced?

23 A. When do we use it?

24 Q. Yes.

1 A. It's the guidelines on use of the
2 marks.

3 Q. I'm sorry. Say that again.

4 A. It's the guidelines on use of the
5 marks. I'm really -- I guess I am not
6 understanding your question.

7 Q. The document that you just described,
8 the license agreement --

9 A. License agreement.

10 Q. -- when is it used?

11 A. It's in connection with our PGR store.
12 They produce goods for the PGR store, and
13 that's, you know, how they're authorized to do
14 so.

15 Q. Do you have an executed version of the
16 license agreement?

17 A. Not with me.

18 Q. Are there executed versions of the
19 license agreement?

20 A. I don't know what executed means.

21 Q. Signed by both parties.

22 A. Yes.

23 Q. What other parties signed it besides
24 the PGR, Inc.?

1 A. Our fulfillment center.

2 Q. Your fulfillment center, who is?

3 A. Fast Color Print, I think, is their
4 full name.

5 Q. What does Fast Color Print do for the
6 PGR, Inc.?

7 MR. O'MALLEY: Objection, beyond the scope of
8 direct.

9 A. They are our fulfillment center. They
10 supply the goods, you know, ship out the goods
11 that are ordered at the PGR store.

12 BY MS. PERRY:

13 Q. Is that the only entity that has signed
14 the license agreement that you referenced?

15 MR. O'MALLEY: Objection. This is beyond
16 direct and beyond the scope of this opposition
17 proceeding, which is the priority of the mark
18 and fraud issues, and what's going on now with
19 their fulfillment center is completely
20 irrelevant.

21 MR. MARR: Can we go off the record for a
22 second?

23 MS. PERRY: Yes.

24 (Discussion off the record.)

1 BY MS. PERRY:

2 Q. Has PGR, Inc. recently filed a
3 trademark application in the United States
4 Patent and Trademark Office?

5 MR. O'MALLEY: Objection, irrelevant, beyond
6 the scope of direct.

7 A. Your question isn't clear to me.

8 MR. O'MALLEY: Also as to time frame, what
9 does it mean?

10 THE WITNESS: That's why I'm not clear.

11 BY MS. PERRY:

12 Q. Within the past couple of months, has
13 PGR, Inc. filed a recent trademark application
14 in the United States Patent and Trademark
15 Office?

16 A. Yes.

17 Q. Why?

18 A. To protect the PGR marks.

19 Q. What's the trademark application for?
20 What is the mark?

21 A. I believe we filed a couple.

22 Q. Explain.

23 A. There were other association terms that
24 we need to address properly as we were learning

1 more about trademark licensing. I said we are
2 all obviously not trademark attorneys, and we
3 are doing the best we can to, you know, move
4 forward, learning and trying to make sure things
5 are being done the correct way.

6 Q. You didn't answer the question.

7 Reread --

8 A. Marks, I'm sorry. I got you. I
9 believe we filed for Standing for Those Who
10 Stood for Us, Rolling Honor Shield, I believe,
11 and I am trying to remember because there has
12 been so much going on with everything else,
13 other PGR stuff not related.

14 I think we've also filed -- I hate to
15 say it, but I haven't -- if I get the wrong name
16 because there's some other things that I don't
17 think we finished doing yet. I would hate to
18 put something on record that I am not sure
19 about. Those two I'm sure we did.

20 Q. Why did you file the applications?

21 MR. O'MALLEY: Asked and answered.

22 A. I think I answered that.

23 MR. O'MALLEY: Objection.

24 A. I think I answered that a moment ago,

1 to protect the PGR's rights.

2 BY MS. PERRY:

3 Q. To protect the PGR's rights?

4 A. Yes.

5 Q. Are both of the marks being used?

6 A. One is currently used. The other is
7 classed differently. One I think was filed as
8 an intent to use.

9 Q. Which one?

10 A. Rolling Honor Shield.

11 Q. Why was it filed?

12 MR. O'MALLEY: Objection, irrelevant, beyond
13 the scope of direct.

14 A. To make sure that PGR had options to
15 support the mission.

16 BY MS. PERRY:

17 Q. Does PGR, Inc. intend to use the mark?

18 A. I really don't know how to answer that
19 question. As being business of the PGR, I don't
20 know if that's something the public -- I --

21 MR. O'MALLEY: Object to the extent it calls
22 for attorney-client privilege.

23 BY MS. PERRY:

24 Q. Does the PGR, Inc. intend to use the

1 mark?

2 A. I don't believe I can discuss that.

3 Q. You can. Please answer.

4 MR. MARR: Can we take a break?

5 MS. PERRY: After he answers the question,
6 yes.

7 MR. MARR: He can finish answering the
8 question, yes.

9 A. I said I believe that's confidential
10 business of the PGR, and since we are in
11 opposition with Mr. Brown, I don't think that's
12 something that hinges on the scope -- not to try
13 and use the term, of what we're -- this is not
14 related to it. That's my answer.

15 BY MS. PERRY:

16 Q. Can you answer the question yes or no?

17 A. As stated, you know, this is something
18 I discussed with the attorneys. I don't think
19 I -- I can't --

20 MR. MARR: Can we take a break now?

21 MS. PERRY: Sure.

22 (Discussion off the record.)

23 MR. O'MALLEY: Okay. Back on the record. We
24 have discussed this. It is our position that

1 your questioning is clearly outside the scope of
2 direct, is clearly irrelevant to the issues at
3 hand in this trademark opposition and don't have
4 anything to do with this as to what their intent
5 is in connection with a different mark that is
6 not a part of this trademark opposition, and so
7 we are going to instruct our client not to
8 answer the question, and if you want to seek a
9 ruling on that, have at it, I guess, but in our
10 opinion this has nothing to do with this matter,
11 and so we are going to leave it at that and
12 instruct him not to answer.

13 MS. PERRY: Okay. The previous question?

14 MR. O'MALLEY: Relating to this whole --
15 these other marks that have been filed.

16 MR. MARR: We can limit it to the previous
17 question for right now, but if you want to go
18 on, we are likely going to have similar
19 objections if you continue in this line of
20 questioning.

21 MS. PERRY: Okay. And as you are aware, in
22 the TTAB proceedings, you know, all objections
23 are reserved other than objection as to form.
24 So those objections are noted. I strongly

1 disagree. However, you know, your objections
2 are noted, and like I said, you preserve all
3 objections as will I to after the deposition,
4 other than as to form.

5 MR. O'MALLEY: I understand that.

6 MS. PERRY: Right.

7 MR. O'MALLEY: And we are still instructing
8 him not to answer.

9 BY MS. PERRY:

10 Q. I am going to ask a couple of questions
11 with regard to the exhibits. Exhibits 4 and 5
12 which you previously gave testimony regarding --

13 A. Yes.

14 Q. -- do you know who wrote these FAQ?

15 A. For a fact, no.

16 Q. You do not know?

17 A. At the time it should have been
18 Schmidtrock, but I can't guarantee that.

19 Q. Okay. So Applicant's Exhibit No. 4,
20 you are stating that you don't know who wrote
21 this FAQ, correct?

22 A. Correct. I know it was posted on the
23 site, but I can't tell you who the author was.

24 Q. Okay. And Applicant's Exhibit No. 5,

1 do you know who wrote the FAQ in this exhibit?

2 A. I can't say for a fact which one --
3 which site team members wrote it, no.

4 Q. So your answer is no?

5 A. Correct.

6 Q. You stated that you joined the PGR,
7 Inc. approximately February of 2006, correct?

8 A. I think I said late February, early
9 March.

10 Q. Okay. You also stated that you first
11 learned of PGR, Inc. at about the same time; is
12 that correct?

13 A. I think I joined the day after I
14 learned.

15 Q. Okay. Had you heard of PGR, Inc. prior
16 to that time?

17 A. Prior -- no. When I learned about it,
18 I looked into it.

19 Q. So you have no personal knowledge of
20 any information relating to the PGR, Inc. prior
21 to February, March of 2006; is that correct?

22 A. Direct knowledge, no.

23 MS. PERRY: Okay. Those are all the
24 questions I have for you.

1 MR. O'MALLEY: Okay. Can we take a couple
2 minute break and decide whether we want anything
3 more?

4 MS. PERRY: Sure.

5 MR. O'MALLEY: Off the record.

6 (Discussion off the record.)

7 MR. O'MALLEY: Okay. Back on the record. We
8 have no further questions.

9 MS. PERRY: Okay.

10 MR. MARR: So I guess that's it. We can go
11 off the record.

12

13 (WITNESS EXCUSED.)

14

15

16

17

18

19

20

21

22

23

24

1 IN THE UNITED STATES
2 PATENT AND TRADEMARK OFFICE
3 BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

4 JEFF BROWN,

5 Opposer,

6 vs.

 Opposition
 No. 91181448

7 PATRIOT GUARD RIDERS, INC.,

8 Applicant.

9

10

11

12

13

14 I, WILLIAM HAROLD RICHART II, being first
15 duly sworn, on oath say that I am the deponent
16 in the aforesaid deposition taken on August 1,
17 2011; that I have read the foregoing transcript
18 of my deposition, consisting of pages 1 through
19 70 inclusive, and affix my signature to same.

20



WILLIAM HAROLD RICHART II

21

22 Subscribed and sworn to
23 before me this 21 day
24 of OCT, 2011

23

24


Notary Public

DENNIS P. KEMP
NOTARY PUBLIC-NOTARY SEAL
STATE OF MISSOURI
JACKSON COUNTY
COMMISSION EXPIRES 8/15/2015
COMMISSION #08412881

1 ERRATA SHEET

2 Pg/Ln Correction

3 ___/___ Change from: _____

4 Change to: _____

5 ___/___ Change from: _____

6 Change to: _____

7 ___/___ Change from: _____

8 Change to: _____

9 ___/___ Change from: _____

10 Change to: _____

11 ___/___ Change from: _____

12 Change to: _____

13 ___/___ Change from: _____

14 Change to: _____

15 ___/___ Change from: _____

16 Change to: _____

17 ___/___ Change from: _____

18 Change to: _____

19 ___/___ Change from: _____

20 Change to: _____

21 ___/___ Change from: _____

22 Change to: _____

23

24 Signature: _____ Date: _____

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 2



PGR Store
3728 S. Elm Place
PMB #137
Broken Arrow, OK 74011-1803

PGR Store Invoice

Date	Invoice #
3/18/2006	2274

Bill To
Richart, Bill 218 E. Boonville Sedalia, MO, 65301

Ship To
Richart, Bill 218 E. Boonville Sedalia, MO, 65301

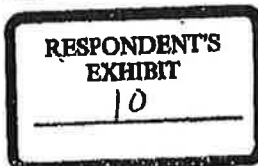
Terms	Via	
Consignment	US Mail	

Quantity	Item Code	Description	Order Status	Price Each	Amount
20	AB	PGR Arm Band		16.50	330.00
20	DTP	Memorial Mission Ride Dog Tag Pin		1.98	39.60
20	Vest Patch	2" X 3" PGR Vest Patch		3.50	70.00

			Total	\$439.60
			Payments/Credits	\$0.00
			Balance Due	\$439.60
			Customer Total Balance	\$462.40
			Job Total Balance	\$462.40

If mailing, please include a copy of this invoice with payment.

E-mail	Web Site
pgr@valomet.com	www.patriotguard.org



PGR 000536

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 3



Monday, November 24, 2008

Patriot Guard Riders Standing For Those Who Stood For us



Jomalley Logout

...: ALL Forums ...

Navigation

- Home
- About Us
- Leadership Contacts
- Letters of Appreciation
- Fallen Warrior Scholarship
- ALL Forums
- Help on the HomeFront
- Most Recent Posts
- Photo Gallery
- Media/Press
- Fallen Members
- Events
- Troop Support Partners
- PGR FAQ
- PGR Gear
- Dialup Homepage
- Hugh's Posts

Directory

Click to send an email to the

Patriot Guard Riders Forum

Unanswered Not Read My Forums Active Topics

Forums > State Captain Area > Headed Discussions with the State Captains
Subject: PGR National and Trademarks

You are not authorized to post a reply.

Author

Twister •
Posts: 1811
Broken Arrow, OK



Messages

22 Jun 2006 10:58 PM

Hey Folks,

Just a couple of items real quickly.

We all need to remember that the PGR is one national organization. We are not, and have no plans to be, 50 state organizations for many reasons. This means there are no state boundaries. If there's a mission in a neighboring state within your riding comfort zone, and you can make it, please do. Let's help each other out to honor a fallen hero.

Along those same lines, we need to make sure we are presenting a unified picture to the families, the public, the media and to all members across the country. I know we're all proud of our individual states and the PGR members in it, and with good reason. But let's remember that we all belong to the PGR, not the Oklahoma PGR. There is no Oklahoma PGR. If we need to, for

Oldest First



PGR 006430

<http://www.patriotguard.org/ALLForums/tabid/61/forumid/120/postid/128917/view/topic/Default.aspx>

11/24/2008

departments below:

- User Support
- Moderators
- Photos
- Media
- Media Sightings
- Submit Picture of Day
- Web Site Administrator
- Communications
- Officer
- Letters Of Appreciation
- Help On The Homefront

Mission Request

Click on the link below to make initial contact with us regarding honor mission requests:

Contact Us

Contact Arlington National Cemetery

Messages

0 Unread Messages

whatever reason, have a state identity, please use "Oklahoma Members of the Patriot Guard Riders". We're all working together here.

The PGR name, logo, "Riding With Respect" and "Scooter Sissy" are all trademarks. Please do not use them without permission. Additionally, please don't think I'm just being a jerk when I have to say "no". Just so you know, in addition to furthering the organization through a uniform image, there are some very sound legal reasons why permission may not be granted. Our attorneys have advised us that if we ever have to go to court to enforce our trademarks, and the defense attorney can cite other instances where we did not enforce our trademarks, it will damage our case substantially.

Please pass this information on to your RC's and members.

Thanks,
Jeff

In the end, we remember not the words of our enemies, but the silence of our friends.
Martin Luther King, Jr.

IndyHarley
Posts: 3856
Indiana



22 Jun 2006 11:29 PM

OK - on a lighter side - does that mean I am the "State Captain within the Patriot Guard Riders who has Members in Indiana"?

Richard 'IndyHarley' Wilbur
Veteran ('65-'69)
SC IN PGR ('05)
Retired LEO and Blue Knight MC Member

For quick Mission Information in IN see - <http://indianapatriotguard.org/missions.htm>

ggolden
Posts: 500
NH State Captain

23 Jun 2006 6:31 AM

Twister brings up a good and valid point. I think a brief piece of wording should be created, telling all what exactly has been Trademarked, and what acceptable uses of those Trademarks are.

PGR 006431

<http://www.patriotguard.org/ALLForums/tabid/61/forumid/120/postid/128917/view/topic/Default.aspx>

11/24/2008

Opposition no. 91181448

4



Saturday, September 02, 2006

...: PGR FAQ :...

Register L

Search

Navigation

PGR FAQ

[Home](#)[About Us](#)[Letters of Appreciation](#)[Leadership Contacts](#)[Forums](#)[Photo Gallery](#)[Media/Press](#)[Fallen Members](#)[Events](#)[Corporate Sponsors](#)[Links](#)[PGR Store](#)[PGR FAQ](#)[Special Events Store](#)

PGR FAQ

Welcome to the Patriot Guard Riders!

As our mission statement says:

We don't care what you ride, what your political views are, or whether you're a "hawk" or a "dove". It is not a requirement that you be a veteran. It doesn't matter where you're from or what your income is. You don't even have to ride. The only prerequisite is **Respect**.

Our main mission is to attend the funeral services of fallen American heroes "as invited guests of the family" Every mission we undertake has two basic objectives:

1. Show our sincere respect for our fallen heroes, their families, and their communities.
2. Shield the mourning family and friends from interruptions created by any protestor or group of protestors.

We accomplish the latter through strictly legal and non-violent means.

As a new member you will have many, many questions. Please check this FAQ and the Forums carefully before posting your questions. There is so much information and traffic on the forums that cross posts are common. This FAQ has been compiled from questions posed on the forum, suggestions by other members, and policies adopted by our National Board.

MEMBERSHIP

PGR 000138

WHAT SHOULD I DO FIRST WHEN I JOIN?

Fill out your information in your profile. State/Ride Captains use this information to contact you.

HOW MUCH INFORMATION DO YOU NEED FROM ME IN MY PROFILE?

It is important that your contact information is up to date in the event we need to contact you. At a minimum you should have your full name, email, city and state. A phone number would be helpful too, if you don't mind. **No one but National and State Captains have access to this information**, so don't worry about it getting out. After you have logged in click on your name in the upper right corner of the screen and it will take you to your profile where you can update your information. This can also be accessed by entering the Forums. You will see a tool bar as pictured below. Click on "My Profile". There you will be able to update your profile and account information and manage your thread and forum subscriptions.

[Forums](#)

[My Profile](#)

[Search](#)

[Members](#)

ARE THERE ANY DUES OR MEMBERSHIP FEES?

No, membership is free. PGR is funded through purchases made from the PGR store, public donations, member donations and member businesses who donate. We also receive funding from the Google Ads in the Forums sections. These ads are in the banner and a sidebar on the left-hand side of the page. Downloading and using the Firefox browser also generates funds.

IS A DONATION TAX DEDUCTIBLE?

Yes. Patriot Guard Riders is a non-profit 501(c)3. Consult your professional tax preparer or the IRS for rulings on deductions for donations to non-profit organizations.

WHAT IS CORPORATE SPONSORSHIP?

Some corporations have elected to support the PGR through sponsorship of operations and functions of the PGR.

DOES THE PGR HAVE ANY PRINTED INFO TO PASS OUT TO POTENTIAL MEMBERS?

Yes. You may purchase approved business cards from a PGR member located in the [Links](#) section of the Navigation Bar. National is also working on a brochure which will soon be available.

HOW DO I GET OUR CLUB'S WEBSITE LINK ON THE LINKS PAGE?

Send the link and a graphic to [Hardbite](#) and he will add it to the PGR site.

QUESTIONS FROM BUSINESS OWNERS:

PGR 000139

DO I OWN A BUSINESS THAT MIGHT BE OF INTEREST TO PGR MEMBERS. CAN IT BE LISTED ON THE WEBSITE?

Yes it can. Send an email to Hardbite@patriotguard.org or Schmidtrock@patriotguard.org with the URL and a graphic from your site including any information you want posted. They will get it posted to the Links section in the Navigation Bar on the Home Page.

DO I HAVE TO OFFER A DISCOUNT TO PGR MEMBERS?

Although many member businesses do, it is not required nor is it expected. If you offer a discount it is at your discretion.

DO I HAVE TO DONATE A PORTION OF THE PROCEEDS FROM SALES TO PGR?

Although some businesses do, this is not required nor is it expected. Many members do like to patronize member businesses that offer a discount or donate funds to PGR from those sales. Any donation is at your discretion.

WHAT IF I HAVE AN IDEA FOR A FUNDRAISER FOR PGR?

All suggestions for fundraisers are appreciated. Fundraising ideas can be posted at the [PGR Suggestions Forum](#) in the National Forum. Any type of fundraiser in the name of the PGR should be approved by National before it is actually implemented. Please read the Forums before posting, your idea may have already been suggested and it may already be in the works.

WILL I GET A MEMBERSHIP CARD?

No. The PGR does not issue membership cards at this time. You may purchase customized business cards from member businesses posted in the [Links](#) listed on the Navigation Bar on the Home Page.

HOW WILL MY STATE CAPTAIN KNOW I'VE JOINED?

The National Board along with all the State Captains (SC) are listed in the Navigation bar on the Home Page under [Leadership Contacts>State Captains](#). Open the link, scroll down to your state and email your SC to let him know you've joined. He/She also monitors the Regional Forums so if you post there to introduce yourself you may be contacted shortly. If you live in a state which does not currently have a captain you can post to the [Regional Forums](#) in your area and let everyone there know you're new. Post to the [Introductions and Shout Outs](#) Forum and introduce yourself.

IS THERE A DRESS CODE OR REQUIRED UNIFORM?

No. Dress for safety, comfort and respect. Many suggestions have been made regarding standard shirts or clothing but National has not adopted a dress code or policy for our members. A family may have a special request due to ethnic or

PGR 000140

religious practices for a specifically colored shirt or other form of attire. Since our mission is "respect," we do everything in our power to honor those requests. Keep in mind that we are there to respect the family, and check your vests for any patches which may contain offensive language. Those patches can be covered with masking tape for the duration of the mission. Many members have decided to use a vest specific for PGR missions. There are several beautiful patches being offered as fundraisers for the PGR. You will find members selling those patches in threads on the **PGR Suggestions Forum** and in the **Links** section on the Navigation Bar on the Home Page.

DO I NEED SPECIAL CLOTHING TO ENTER MILITARY INSTALLATIONS?

Some missions do take place on military installations. These installations do require certain safety equipment for entrance to the base. This includes, but is not limited to, a DOT approved helmet, long sleeve shirt, full-fingered gloves, boots covering the ankle and long pants. Many installations also require a bright colored or reflective safety vest or belt.

CAN I WEAR MY M/C COLORS?

Some Law Enforcement Agencies have a "No Colors" policy for large groups of motorcyclists. You will be notified of this in the mission thread. Please respect their request and leave your colors at home. If you are unable to do so due to requirements of your club, we understand completely but ask that you stand down for the mission.

If you belong to another riding club please check with them before placing the PGR patch and pins on your club vest. Many clubs do not allow other patches and pins on their vests. They may also have restrictions regarding where you may wear your vest with their patch.

PGR BACK PATCH

The PGR is NOT a Motorcycle or Riding Club. This back patch is not representative of, nor is it an indication that PGR is a Motorcycle or Riding Club. We do not earn this patch but purchase it from our store. Back patches representing M/C's or R/C's are earned by their members during the year or two in which they "prospect" or serve as a prospective member. They work hard to earn the right to wear the patch.

If you choose to purchase or wear the back patch please check with your state captain to make sure that he/she has contacted the COC in your state for approval of the patch BEFORE you purchase the patch. COC in some states are recommending that the back patch not be worn due to safety concerns for our members. Trust in their judgment, they are more aware of the attitudes of the individual M/C's than we are. **WARNING:** if you are asked to remove the garment on which you are wearing the patch, please do so immediately, and without contention, for your personal safety.

For more information regarding the 1%'ers, M/C's, R/C's and their traditions and policies please go to **M/C educational information**.

ARE THERE REGULAR CHAPTER MEETINGS?

PGR 000141

No. The PGR is a volunteer organization not a motorcycle club. We do not hold regular meetings however many folks organize informal area or state get-togethers and meet-n-greets. You will find information regarding these in your [Regional Forums](#). Each region contains a thread specific to your state.

SINCE I AM A MEMBER CAN I USE THE PGR LOGO AND NAME?

The PGR logo and name is copyrighted and restricted to specific use. Anyone wishing to reproduce the logo or name for personal and/or business use in graphics of any form MUST receive permission from National, contact Jeff "Twister" Brown jbrown@patriotguard.org before using it.

WHERE DO I PURCHASE PGR ITEMS?

The link to the [PGR store](#) is located in the Navigation Bar on the left-hand side of the Home Page. You will need to create a separate log-in from the one you use to log in to the PGR main site. Once you have entered the store please take the time to familiarize yourself with the policies and procedures of the store. Many of the questions you may have about the store will be answered there.

PGR STORE CHANGEOVER ISSUES

The new Online PGR Store is automated in many respects. This assures fewer errors, faster processing and more accurate delivery of the items you order. Included in the automation is inventory. When an order is received for an item, the system automatically reduces the inventory level of that item by one. All orders, including back orders, are automatically processed on what's called the FIFO method (First In-First Out). What this means to you is pretty simple... Your order is filled in the order in which it was received, regardless of whether it's in stock or back ordered. If an item is on back order, and you wait to order it till you see it's in stock, there may be a hundred people who have already ordered it and will be ahead of you. So, if something shows as on back order, and you want one, go ahead and order it and you'll be in line as soon as they arrive. In an attempt to reduce shipping expenses, the system allows for only two shipments per order; an initial shipment of all items currently in stock when the order is received, and one final shipment only when all B/O items are in stock.

During the change over from the old to the new PGR Store, inventory levels are "iffy" because the "old" and "new" stores are different software systems. Back orders being filled from the old store do not automatically reduce the inventory levels in the new store records. Therefore, it is possible that items show "in stock," but are actually already depleted. As time goes on and the "old store" orders are processed, this will clean itself up. When a shipping label is pulled up for printing, the order is automatically transferred to the "Shipped" category in your account records. This can result in some instances where your account shows an order as having been shipped when it actually was not. It will be shipped as soon as the items arrive in stock. Please bear with us as we work through these issues. The new system looks like it will work great as soon as all of the old store orders are finally processed.

Please keep in mind that the PGR Store is not Wal-Mart. We process orders after our "9 to 5" jobs and other PGR

PGR 000142

responsibilities. We're working as fast as we can, but it may take up to 4 weeks for us to receive items on back order.

REGARDING THE PGR ONLINE STORE:

A number of people have asked if they or a friend can duplicate some of our stuff for free to help the cause. Our PGR name and logo is copyrighted for a reason. The revenue generated from the sale of PGR products enables us to operate this site and continue to grow the organization without any dues, donations or fees. We also have other plans down the road.

All associations have their own stores (VFW, AL, RFTW, etc.) and do not allow reproductions for the same reasons. We've also tried to keep our pricing lower than comparable products through other associations. I hope you understand and support this policy.

WHAT IF I HAVE AN IDEA FOR AN ITEM FOR THE STORE?

Suggestions for the PGR store can be posted in the National Forums under the heading **Patriot Guard Store**. Check the threads in that Forum before you post. Your idea may have already been suggested and the answer will be there.

WEBSITE QUESTIONS

ONCE I'VE JOINED HOW DO I LOG INTO THE SITE?

The Log-in is located in the far upper right hand corner of the Home Page. If you Log in and check the box to "Remember Login" you will not need to log in each time you visit the site.

WHAT IS THE PHOTO GALLERY AND CAN I POST PICTURES THERE?

The photo gallery is reserved for PGR missions and events only. On your missions you may take photos and or videos with respect. **Please respect the family and fallen hero by not photographing them or the casket unless specifically requested by the family.** Photos such as these will not be posted in the gallery in respect for our hero unless the file is specifically labeled that family permission has been obtained.

Please, please please, (did I say please ?) limit your camera resolution to 640x480. This is the standard viewing size for internet pics and will turn out just fine. Secondly it limits the file size to below 1mb. I've been receiving some incredible pictures but at huge resolution resulting in 1-2mb per picture. Our server isn't infinite in storage space and I would hate to have to start culling mission photos for space considerations.

Place your photos in a .zip file labeled with the hero's name and location and mail to schmidtrock@patriotguard.org and we will get them posted up ASAP.

PGR 000143

To do this with Windows OS, once you have the pictures uploaded to your computer, navigate to the folder you saved them in. While holding down the shift key, highlight each and every pic file you want to send. Once they are all highlighted, right click on the last one highlighted and select send to/compressed file. This will create a .zip file for you to attach to your email and send off to schmidtrock@patriotguard.org

Files should be no larger than 4-6 MB to ensure the photos will be received.

NAVIGATING THE PHOTO GALLERY

Click on the folder you would like to view. Once you have finished viewing that folder you can return to the main gallery by clicking the small arrow on the very left-hand side of the tool bar. To exit the gallery and return to PGR home page click the house icon in the upper right hand corner of the tool bar at the top of the gallery. The tool bar also allows you to email, download images in two sizes, and view images in a slideshow format.

WHAT ARE THE FORUMS AND HOW DO I USE THEM?

The forums are message boards set up for us to communicate with each other. They are "**Public Forums**," so anyone can read them, including the families of our fallen heroes. Please take a few moments to familiarize yourself with the different Forums and their content. They each serve their own purpose. Stop in to the **Introductions and Shout Outs** and tell us a little about yourself. Make a connection in your **Regional Forum** also. There you will meet members in your area, learn about specific activities in your state and let others in your location know you're a new member. **Please check all pages of the threads before you post your suggestions or questions. You may find the answer already there.**

Once you have entered a Forum by clicking on its name you may subscribe to it by checking the "**Email me when someone posts to this forum.**" You will find this located at the top of the forum on the left-hand side. If you don't wish to subscribe to a Forum but want to keep track of a particular thread you may check the box labeled "**Email me when someone replies to this thread**". You will need to enter the thread by clicking on it in order to subscribe to it.

WHAT ARE ALL THESE GOOGLE ADS IN THE BANNER AND SIDEBAR OF THE FORUMS?

This is another way to fund PGR. PGR does not have control of the ads placed in the Banner and Sidebar and can not remove specific ads from these areas. Clicking on the ads sends funds to PGR.

There have been times when the Banner Ads have caused a slow down on navigation of the site. This problem can be fixed but will only work for users who are using the Internet Explorer browser, are running Microsoft Windows XP, and have their system up to date to at least Service Pack 2 (if you don't you won't see the "Manage Add-ons" under tools) if you are running Windows 98/ME or Windows 2000 this fix is not available to you. For I.E. ver. 6 users, since the ad uses the Macromedia Flash browser plug-in to function, you can simply disable it within the browser which will kill the ad and free your surfing within the PGR forum back up.

In Internet Explorer click on <Tools>, <Manage Add-ons>, Show "Add-ons that have been used by Internet Explorer."

PGR 000144

Look in the list in the window until you see something labeled like "Shockwave Flash Object," highlight it, and at the bottom of that window under settings, set it to "Disable." You may have to restart the browser for it to take effect, but the Flash add should be gone and surfing should return to normal. Just remember to re-Enable your Flash plug-in if you go elsewhere on the web to a page that uses properly coded Flash that doesn't hang up I.E. Not everyone should have to download and install a different browser just because of poor coding.

FORUM TOOLS

[Delete](#) [Edit](#) [Quote](#) [Reply](#) [Alert](#)

Directly above your post on the right-hand side you will find the tool-bar indicated above. You may delete or edit your own posts. Forum moderators are the only ones who can delete/edit posts of other members. If you find a post to be offensive, you may notify the Moderators by clicking on the Alert button directly above the offending post. **Please include your screen name AND full name as a signature to your alert.**

If you would like to reply directly to a specific post you may click on the Quote button directly above that post. This will highlight that post and place it in your reply. Type your reply and click Submit. If you simply wish to reply to the thread you may click on the Reply button.

QUICK REPLY

Located at the bottom of the thread is the Quick Reply. This allows you to reply to the thread but **does not allow** for uploading files and pictures or to post an active link. You must use the Reply button at the top of the thread to do so. Please keep posting of pictures and graphics to a bare minimum since this just eats up bandwidth. Mission pictures are not posted in Forums. They must be submitted to the webmaster in a specific format for upload to the **Photo Gallery**. Further instruction for posting mission photos is contained in this FAQ under **How Do I Use the Confirmed Mission Forum**.

PRIVATE MESSAGES (PM)

You can contact another member privately by using the Messages box located beneath the Navigation Bar on the left-hand side of the forums pages. It can also be found on the Home Page in the upper right-hand side beneath your name. You may also send an email to a member through the forums by clicking on his/her screen name highlighted in blue to the left of his/her post. This will take you to their profile where you will find their email address. Some members do not list email addresses so you may need to use the PM feature to communicate with them.

MORE TOOLS

[My Profile](#)

[Search](#)

[Members](#)

PGR 000145

This tool bar is located in the upper-right hand corner of the Forums pages. The "My Profile" link will take you to your profile where you can make any changes necessary. You can use "Search" to look for a particular post or subject on the forums. The "Members" link will take you to an alphabetical listing of all PGR members.

FORUM ETIQUETTE

Please keep in mind at all times when posting that these are **public forums**. Although you must log in to post to the forums anyone can read the messages. Families often times check the forums for communications regarding their loved one. The general public as well as prospective members are also able to access these forums. Law Enforcement, Clergy, and Media also check our site. Please keep the language of your posts clean. Political debates and statements are discouraged and posts containing these types of messages will be deleted by our Moderators. While references to protesters are sometimes necessary, discussions regarding protesters are discouraged, they are not the real reason we are here. Our mission is to honor and show respect to the fallen heroes and all veterans. We have been praised time and again for our professionalism on our missions. That attitude should carry over into our communications on our website. If you have a problem with a post or another PGR member please notify the moderators by clicking on the ALERT button found directly above the post in question. **Please include your screen name and full name as a signature to the alert.**

WHAT DO ALL THESE ABBREVIATIONS AND TERMS MEAN?

SC - State Captain. The State Captain monitors and sets up missions. There generally is only one State Captain per state. The SC makes contact with Law Enforcement (LEO), the Family, the Church, and Funeral Directors, to set up a mission, but may delegate that to a Ride Captain (RC) if absolutely necessary. State Captains can recruit as many Ride Captains as they feel they need to accomplish our objectives.

PRC, TRC & RC - Permanent Ride Captain, Temporary Ride Captain and Ride Captain. SC's recruit RC's in varying parts of the state to help recruit riders and groups in their areas and help with missions. A Ride Captain can be temporary RC (filling in if a SC or another PRC cannot make a mission) or permanent RC. Permanent RC's are listed on the Captains page and have full access to member's lists.

Maroon PGR Ball Caps. Maroon PGR ball caps are worn by State and Ride Captains to make it easy for mission attendees to identify them.

UG - Uninvited Guest. An UG is any individual or group that is there to disrupt the services of a fallen hero. This is our preferred term to be used for any protesters.

LEO and LE - Law Enforcement Officer and Law Enforcement. Local, County, and State Law

PGR 000146

Enforcement Officers are the folks who make the majority of missions safe. Without their assistance, the PGR would not be as successful as it is.

CAO - Casualty Assistance Officer. These are the military men and women assigned to help the family.

COC - Confederation of Clubs

This is an organization that was founded to oversee all motorcycle clubs in the United States. It is made up of representatives from many, if not all, of the M/C's in the country. It is not a governing body per se, but a resource to which various M/C's may go to resolve disputes and issues, and also serves as an advocacy group for various clubs. Some states do not have a COC but may have another organization similar to it. Some states, due to their size, may have more than one COC.

KIA - Killed in Action

MIA - Missing in Action

POW - Prisoner of War

CAGE - A car or truck, enclosed vehicle.

DOD - United States Department of Defense. This is the agency from which we get our notices of KIA service members.

ROAD GUARD - Assists the RC with traffic control such as blocking intersections from cross traffic. They also keep an eye out along the line for potential problems.

TAIL GUNNER - This is usually the last rider of the group. His/her responsibilities may include, but are not limited to, staying alert for possible problems within the group, keeping the group in formation and up to speed, assisting with Road Guards. Many may be able to communicate with the RC by CB to report any accidents or problems.

STAND DOWN - This usually means that a watched or confirmed mission is cancelled. This can be because a family has requested a family-only service or the service has been moved to a different state. If the service is moved to a different state the mission thread will be changed to reflect the move.

PGR 000147

HOW DO I USE THE WATCH LIST FORUM?

POSTING KIA NOTICE

It has been determined by National that to avoid confusion, that only the Web/Forum administrators will post KIA Notices confirmed by DOD in this forum. If you receive or notice a media story of a KIA not yet posted please refrain from posting. Our troops have embedded media reporters with them and there is no way to determine how the story got out or if the family has been notified properly if there is no DOD Confirmation Release. Instead, please forward the story to your state captain and courtesy copy web@patriotguard.org

REPLY POSTS

In order to help cut down the confusion and thread buildup please refrain from posting such as "Keep me posted," or asking if there is pertinent info on a KIA yet. The state captains and ride captains are working diligently in the background to get this info to you. **SCs and RCs** once you have pertinent information that a mission is confirmed please make a reply post as such and send a courtesy email to web@patriotguard.org. At this time the thread will be moved into the Confirmed Mission Rides forum after the mission has been confirmed by the **SC or RC**.

To help keep the Mission threads on track please limit it to mission information only. Idle conversations and meet and greets can be posted to the **Off Topic** or **Regional** sections of the Forums. This helps keep the information on mission, times and places easy to find.

If you see a media report about services with times and locations please refrain from reply posting this as well. Instead please forward this info to your SC or RC and courtesy copy web@patriotguard.org

Web administrators have provided a new module to the website in the Private Message feature. You can easily and quickly send your SC or RC a PM now.

HOW DO I USE THE CONFIRMED MISSIONS FORUM?

ITINERARY POSTING

SCs and RCs will be posting Mission Itinerary information as it becomes available. Once this is posted Web Administrators will re-post the itinerary to the **first post** in the thread and make an edit to the subject line that says Itinerary Update. The date will also be added to the subject line.

REPLY POSTING

Feel free to post any questions you have at this time pertaining to the mission itinerary, staging locations etc. In order to

PGR 000148

5/1/2008 9:57 AM

cut down on confusion and thread buildup though, please refrain from posting such as "Keep me posted," etc. Please use the Private Message function or emails to communicate to your SC or RC's.

If you see a media report about services with times and locations please refrain from reply posting this as well. Instead please forward this info to your SC or RC and courtesy copy web@patriotguard.org.

To help keep the Mission threads on track please limit it to mission information only. Idle conversations and meet and greets can be posted to the **Off Topic** or **Regional** sections of the Forums. This helps keep the information on missions, times and places easy to find.

RIDE REPORTS

Once a mission is complete the subject line will be edited to read Mission Complete. **At this time please refrain from posting any afterthoughts until the SC or RC has had a chance to gather thoughts and post a Ride Report.** At this time the thread will be locked and the Ride Report thread will be available for your comments and thoughts. The Mission thread will remain in the Confirmed Mission Rides forum in a Mission Complete status for 3 days to reflect on the Home Page sidebars and direct further readers to the Ride Report Thread. It would be nice if you could check in on the Ride Report once you have arrived home so your SC knows you are home safe and sound.

MISSION PHOTOS

On your missions you may take photos and or videos with respect. Please respect the family and fallen hero by not photographing them or the casket unless requested by the family. Photos such as these will not be posted in the gallery out of respect for our hero.

Please refer to the "WHAT IS THE PHOTO GALLERY AND CAN I POST PICTURES THERE?" FAQ for information on posting mission photos.

CAN I RECEIVE EMAIL NOTIFICATIONS OF MISSIONS?

Our SC/RC's are extremely busy making arrangements for missions in their areas. Although some State Captains are able to set up email lists for notification it is not done as a rule. The SC/RC's are incredibly busy working behind the scenes to contact family, map out routes, recon staging areas and coordinate with local Law Enforcement. They simply don't have time to email all members in their state. While many SCs do a single alert email to his state/area members this is not always the case. Please keep in mind that this is a volunteer organization and most of these folks also have jobs, families, and other PGR duties. It is your responsibility to keep track of possible missions.

You can receive blanket email notifications by subscribing to the Watch List. Possible missions are posted there until they become a Confirmed Mission. Click on the Watch List forum. In the top left-hand corner you will see **"Email me when someone posts to this forum."** Put a check in that box. Any posts to that forum will be sent to the email address you have listed in your profile.

PGR 000149

Several members have set up a separate email address for PGR communications due to the high volume of information they wish to receive from the site. You may also want to keep track of other threads that are of interest to you. This will allow you to keep PGR communications separate from business and personal email. If you do not wish to receive blanket email from the Watch List you will need to log on to the site and check the list periodically. Information can change rapidly for missions so it is suggested that you check at least once a day. If you find a mission in your area you can enter the thread for that mission and subscribe to that thread by checking the Email notification box as described above.

WHAT IS THE DOD WEBSITE?

This is the **US Department of Defense** website. On the right hand side of the site under Press Resources you will find the link for Releases. An official notification of KIAs comes from the DOD. Once the DOD has released the information this means that all family members have been notified and the Moderators then post the listing to the Watch List. You may subscribe to the DOD website, however, **ONLY** the moderators will post the official notices to the PGR website. The missions are posted to our site in the same format used by the DOD so they are found more easily by people using a search engine such as Google.

WHAT TYPE OF MISSIONS DO WE DO?

Our main mission is to honor our fallen heroes, their families, and communities by attending memorial services and funerals. We are there to pay our respects and to shield the families from any interruptions by uninvited guests. While this was the original purpose of the PGR at its inception, our missions have expanded to include many other activities. Other programs are being implemented frequently. You can check the **Special Missions** Forum in the Ride Information section for updates. A link can also be found for specific special programs in the Navigation Bar under **About Us>Our Programs**.

WHAT IS A SPECIAL MISSION AND WHAT IF I HAVE AN IDEA FOR ONE?

The PGR has evolved into a group that honors all veterans from all conflicts. We have added **Special Missions** to include welcome home escorts for returning military personnel and units, send-offs, parades, visits to veteran's retirement homes, hospital visits to wounded vets and many other events. If you have an idea for a Special Mission you can contact your SC with the information. You will find more information regarding special missions under the **Ride Information** Forums.

WHAT IS HELP ON THE HOMEFRONT

Help on the Homefront is a charitable function which aids wounded veterans and their families. Ronny "Bear" Awtry is the one to work with regarding this wonderful mission.

MISSIONS

HOW DO I FIND OUT ABOUT MISSIONS IN MY AREA?

PGR 000150

You will use the Watch List and Confirmed Missions List. You may access these lists one of two ways. On the Home Page you will find a column on the right-hand side of the page. Click on the Watch List or Confirmed Missions List heading and it will take you to the respective forum. You can also access the lists by placing your cursor over the Forums link in the Navigation bar on the left-hand side of the page. A drop down menu will appear and you can then choose which Forum to enter by clicking on it. For further instructions please see the FAQ section for Forum Use.

WHAT CAN I EXPECT ON A MISSION?

This is a time of mourning and it is be very emotional for the family, community and the PGR members. It can get overwhelming so just let it flow. You will see many of your fellow members in tears or otherwise greatly affected. Don't hesitate to give a hug or offer a hand. We are all feeling the same emotions. You will also feel a great sense of pride in being there.

Your State or Ride Captain will have set up a staging area for everyone to meet. Please make sure you are there on time, fueled up and have already performed your pre-ride safety checks. Your State/Ride Captain will hold a briefing for any instructions and last minute information you may need. Please be sure to check the thread for that mission thoroughly just before you leave to make sure there aren't any last minute changes for times and locations. It is recommended that you print out the itinerary posted in the thread to take with you. Many SCs will post Mapquest links within the thread to assist you with directions to various staging areas.

The normal formation, but subject to your State or Ride Captain's discretion, with National approval, will be bikes with large flags in front, the rest of the bikes, then cars or other vehicles. In most cases there will be a pre-designated place for us to park, if not please DO NOT park in areas close to the building where the family and friends should park.

Once at the service there may be changes as to what we do or where we can help depending on what the family, funeral director, or LEOs want or need, so be listening up for the State or Ride Captain to make more announcements. On one mission we helped direct parking because the funeral home did not have enough people.

WHAT IS A LIABILITY WAIVER?

It is an agreement that you ride the mission at your own risk without holding Patriot Guard Riders liable for any accident or injury resulting from your participation in the mission or event. You will be required to sign a liability waiver list in order to ride/drive or attend a mission. The list is made available at each mission and must be signed at each mission.

DO WE ATTEND THE ACTUAL SERVICES?

Many families invite us into the chapel to attend the actual service. It is up to you if you choose to do so. Your SC/RC will let you know if the invitation has been offered.

CELL PHONES

PGR 000151

Please turn your cell phones off or to "silent" during the mission. If you must make or take a call please remove yourself from within the sight and hearing of the family and other participants until your call is complete.

SMOKING/EATING/DRINKING

Please pack your trash back out with you if you can't find a proper receptacle. Put your butts in your pocket until you can find a can or ashtray. The use of a film canister or baggie has been suggested to discard butts. Absolutely NO consumption of alcohol during a mission. Respect includes respect for the church, funeral home or cemetery grounds.

YOUR THROTTLE

If you must leave a mission early please choose an appropriate time preferably immediately before or after the services. Always remember this is about respect and keep your throttle to a minimum when starting and leaving the area.

WHAT DO I BRING TO A MISSION?

Make sure you bring water to drink. If you know it's going to be a long day bring some snacks or even pack a sandwich. Some folks have been known to generously provide water and snacks during the mission but this is not expected of them and it is your responsibility to provide your own. If, by chance, they have a donation jar located near the snacks feel free to drop something in to help defray their costs. Many also choose to donate back to the PGR. You are under no obligation to make the donation.

You may want to bring your own flag. A collapsing pole is recommended for ease of carrying if you do not wish to attach it to your bike. JTDent offers a discount to PGR members. Most State or Ride Captains will have a number of flags with them but the more we have the better. If you need flags check the Links section in the Navigation Bar for both bike flags and 3'X5' flags.

Other equipment like, cold weather gear, rain gear, leather good, patches and business cards are avail in the Links. These are made available by PGR members at special pricing in most cases below wholesale. PGR flags are available through the PGR store.

You can purchase different types of flag poles and mounts. Check out the Forum thread Flag Mounts. You will find a wealth of information there for mounting flags on your bike.

Sunscreen and a small first aid kit are highly recommended.

HONORING SPECIAL RELIGIOUS OR ETHNIC TRADITIONS.

Our main purpose is to honor the fallen hero. We already do that with our presence and display of flags. There is no need to further honor religious or ethnic traditions of the family or community unless a specific request is made. If a family or community chooses to offer their thanks with a patch or other form of gift, as has been done on a previous mission, it is not

PGR 000152

up to us to return the favor. Gift-giving may be required by ceremonial traditions of certain ethnic groups. Some religious or ethnic traditions require clothing of a certain color. The family may make this request. Since our mission is to show honor and respect we make every effort to honor the family's wishes.

WHAT IS THE PGR PLAQUE?

The plaque is something that is presented to the families of the fallen service member. It says: "On behalf of a grateful America and the Patriot Guard Riders, please accept our sincere condolences on your tragic loss. May your pain be tempered by the knowledge that "NAME" is a true American Hero." Then it has the PGR emblem on the bottom. It is paid for by any revenue created by clicking on the ads on the sides of the website, or by some purchases from the PGR store.

WHAT IF A MISSION IS CANCELLED?

If a funeral mission is cancelled due to the family's request we DO NOT attend. This would be disrespectful to the family. If it is a public event you may attend as a citizen but we ask that you leave your PGR items at home, if possible. Our mission, first and foremost, is respect. Not only does that apply to families but also to the communities in which we live and serve.

ARE MISSIONS EVER LIMITED IN ATTENDANCE SIZE?

A family may wish to invite the PGR but only on a limited basis. Again, we do everything we can to honor the family's request.

DO I SALUTE AT MISSIONS?

It has been suggested that civilians should salute by placing their right hand over their heart. Many military personnel will give a hand salute or place a hand over their heart. While it has been customary that only military personnel in uniform should salute, recent changes in thought have led to giving a choice to those who have served. PGR maintains that the salute is your personal decision as long as it is in keeping with our mission of respect and honor.

HOW DO WE SHIELD THE MOURNERS FROM THE UGS?

If protestors are in attendance we simply hold our flags with our backs turned to the protestors. We, in no way, engage the protestor either verbally or physically. We may sing, rev our engines or say the Pledge of Allegiance but that is strictly up to the direction of the SC/RC. Take your cues from them.

WHAT DO I DO IF AN U.G. ATTEMPTS TO PROVOKE ME?

Stand with your back to them and ignore them. Your only function at the mission is to pay your respects to the fallen hero and his/her family.

PGR 000153

CAN I BRING MY CHILDREN TO MISSIONS?

Yes. It is suggested that you use your best judgment with smaller children. If your child becomes restless please be prepared to remove him from the area so as to not disturb the services. Perhaps you and your spouse or a friend can agree to a plan of action before you attend the mission. Talk with your children before hand to prepare them for what may happen. You will find that they may be able to understand more than you think. Give them a flag of their own that is a size they can handle. Teach them some flag etiquette. This can be a positive experience for your child.

FLAG ETIQUETTE

The flag that is of the utmost importance is our national flag, to which the greatest respect should be paid. No other flag can be flown above the national flag.

It is imperative that no one show disrespect to the national flag.

The national flag should never be "dipped" or lowered to any person or thing.

However, Regimental colors, State flags, and organizational or institutional flags can be dipped as a mark of honor. The flag should never be allowed to touch the ground. Flags are displayed in a specific order with the US flag always being in front of a line or on its own right. If, in a flag line, you are in doubt of your position please ask your SC or another member if you are in the correct position if you are holding a flag other than the US flag.

HOW DO I MOUNT FLAGS ON MY BIKE/CAR?

The American Flag is always mounted on its own right. The flag's own right is the side of the Canton, or blue field of the flag, also referred to as the Union. Other flags are mounted to the left of the American flag and at the same level or lower than the American flag. When several flags are used they are to be displayed in this order from the American flag's own right: US, other countries, states, counties, cities/municipalities, military branch, organization, and symbolic or personal. See the picture below for an example. This example also applies to cars and trucks.

This is directly from the U.S. flag code:

SEC. 3 That the flag, when carried in a procession with another flag or flags, should be either on the marching right; that is, the flag's own right, or, if there is a line of other flags, in front of the center of that line.

- (a) The flag should not be displayed on a float in a parade except from a staff, or as provided in subsection (j)
- (b) The flag should not be draped over the hood, top, sides, or back of a vehicle or of a railroad train or a boat. When the flag is displayed on a motor car, the staff should be fixed firmly to the

PGR 000154

chassis or clamped to the right fender.

- (c) No other flag or pennant should be placed above or, if on the same level, to the right of the flag of the United States of America, except during church services conducted by naval chaplains at sea, when the church pennant may be flown above the flag during church services for the personnel of the Navy. (See Public Law 107, page 4)

Present Arms -Salute or put your hand over your heart, whatever you are comfortable with.

If you are a flag bearer, do not salute or cover your heart.

The US FLAG is presented straight up with no dip whatsoever and no salute will be hand rendered when bearing the flag. All other flags including PGR flag will be dropped to a horizontal position.

Cover - headgear, hats. Some members feel this includes do-rags.

Covers are not required to be removed during present arms in an outdoor environment.

Covers should be removed for prayers.

HELMET LAWS

WHICH STATES HAVE HELMET LAWS AND WHAT ARE THEY?

Listed here you will find all the helmet laws for all 50 states. Further information on the actual statutes is available [HERE](#). While some states seem to have no helmet law they actually do require a helmet unless specific insurance requirements are met. Please check laws in individual states for specifics.

Of the fifty states, only 4 are 100% helmet law free!

Colorado, Illinois, Iowa and New Hampshire

Of the other 46 states, 20 have full helmet laws for all motorcycle riders:

Alabama, California, Georgia, Louisiana, Maryland, Massachusetts, Michigan, Mississippi, Missouri, Nebraska, Nevada, New Jersey, New York, North Carolina, Oregon, Tennessee, Vermont, Virginia, Washington, and West Virginia.

PGR 000155

19 States have helmet laws that exempt adult riders, riders over the *age of majority* - 18 years old and over. Those states are:

Alaska, Arizona, Connecticut, Delaware, Hawaii, Idaho, Indiana, Kansas, Maine, Minnesota, Montana, New Mexico, North Dakota, Ohio, Oklahoma, South Dakota, Utah, Wisconsin and Wyoming.

There are 7 states that require helmets for riders between the ages of 18 and 20.

Arkansas, Florida, Kentucky, Pennsylvania, Rhode Island, South Carolina, and Texas.

MISSION SAFETY

WHERE CAN I GO TO LEARN MORE ABOUT GROUP RIDING?

The **Motorcycle Safety Foundation** has excellent courses on group riding. Sign up for a class and hone your riding skills. Some Owner's Groups also give you a gift certificate for merchandise after you have taken the classes. This link contains three excellent videos that you can watch to get an idea of what is required for basic and group riding. Scroll down below the US map to the videos marked WATCH.

WHAT IS A CHASE VEHICLE AND WHAT DO THEY CARRY?

A chase vehicle is a car or truck which carries extra equipment for a group of motorcycle riders. This is a ***suggested*** basic list. You may not be able to carry all items listed. You may have more than one chase vehicle per mission and you can split the list with another vehicle.

For People

- Protein snacks
- Water
- Bottled water (bottles of water in an ice chest)
- Ice
- Gatorade
- Well-equipped First Aid kit to include:
 - Aspirin
 - Ibuprofen
 - Electrolyte tablets
 - Benadryl
 - Blanket
 - Towels

PGR 000156

- Latex gloves
 - Snap and shake cold packs
 - Space blanket
 - Antibiotic cream
 - Band-aids
 - Gauze pads
 - Bandage tape
 - Scissors
- Stuff for Bikes**
- Bungee cords
 - Flag Tie Downs
 - Ratcheting nylon tie-down straps.
 - Fuses
 - Duct Tape
 - Electrical Tape
 - Tow Rope
 - Air compressor or air tank (for soft/flat tires),
 - Tire Patch/plug kit
 - Highway markers/flares,
 - Reflective vests (for folks having to direct traffic around a break-down, etc.),
 - Flashlights (the new no-battery type),
 - CB radio,
 - Pre-paid cell phone
 - Basic tool kit to include SAE and metric tools
 - Loctite
 - Jumper cables
 - Battery charger
 - Low jack with a flat plate that would go under a bike.
 - Gasoline 1 - 2 gallons
 - Crankcase oil
 - Hypoid Gear oil
 - Bailing wire
 - Zip-ties / Wire Ties
 - Assorted Hose Clamps (diff sizes)
 - W/D 40
 - Rags/Towel
 - Hand Cleaner

PGR 000157

- Extra Flags and poles

Stuff for Chase Vehicle

- Large caution sign on the rear of the truck
- Revolving yellow lights on top (check local laws)
- Two 7" x 20 yellow w/black stripe vertical caution signs to hang on either side of the tailgate

WHAT ARE SOME OF THE "COMMANDS" AND TERMS I HEAR DURING MISSIONS?

Kickstands up, Saddle up, Clutches out - This means we're leaving.

Present Arms - Stand respectfully with your flag, salute or put your hand over your heart, whatever you are comfortable with. If you are a flag bearer, do not salute or cover your heart. The national colors are presented straight up with no dip whatsoever and no salute will be hand rendered when bearing the flag.

Cover - headgear, hats. Some members feel this includes do-rags. **Covers are not required to be removed during present arms in an outdoor environment.** Covers should be removed for prayers though.

Parade Rest - relax

OTHER COUNTRIES

DO WE RIDE IN CANADA?

We have several Canadian members but, to date, have not ridden a mission in Canada though this is changing. National is working on a network for a Canadian branch of PGR. As of the writing of this FAQ we have one mission on the Watch List.

WHAT DO I NEED TO CROSS THE BORDER TO AND FROM CANADA?

- Driver's license or state ID for every adult in the vehicle should have birth certificates for all minors. Passports are going to be required within the next few years.
- No fireworks, weapons, firearms.
- If you have a DUI or OUI or any felony, you can be denied entry to Canada.
- You must have proof of insurance (even though they usually don't ask for it at the border).

PGR 000158

- Speed limits are in kilometers!!! 100 km/h = 60mph
- As with everything, you need to be polite and pleasant, because if you give any attitude, you will encounter problems entering either country.
- All Canadian provinces have universal motorcycle helmet laws.
- Some smaller border crossings aren't open 24 hours.
- Radar detectors are illegal.

When physically going through the border crossings, at minimum, ALL occupants are going to be asked where they're from, where they were born, where are they going, how long are you staying... but they can ask any other question they want. 9 times out of 10 you can get right through, but it is in their right to have you pull over and they will search the vehicle THOROUGHLY! Sometimes it's easier to avoid crossing at the larger "main" border crossings and going through some of the smaller points of entry instead, the guards don't seem as stressed.

Going to Canada, you can take 1 carton of cigarettes and 40 oz of liquor or a case of beer, preferably purchased at the "Duty Free" store at the border. Coming back, you can bring the same amounts back, but only if you've been in Canada for over 48 hrs (if it's less than 48 hrs, you would have to pay taxes on it). After 48 hours in Canada, you can bring back up to \$400.00 in purchases (keep ALL receipts) - if it's under 48 hrs, once again, you would have to pay taxes. You're not supposed to bring plants, fruits or vegetables either way, although it seems to be stricter coming back in the US. (When crossing, most places will record your license plate, so they know how long you have been there.)

Canada has lots of taxes, if you spend over \$200.00 on hotels or "large" purchases (not food, restaurants or little odds and ends), you can get the federal taxes (GST) back - there are forms available at the border and you can claim it there or you can mail it in. The receipts can be accumulated up to 2 years.

Most all Canadian's speak English. Those in the Province of Quebec speak French and prefer only French, and the signs are in French (where other Provinces have them in English and French).

Gas prices are almost double in Canada; fill up prior to crossing the border. Everything is metric, so gas is by the liter (approx 35% + higher).

Right now the exchange rate is roughly \$1.00US = \$1.10CA. We have found that it's easier to withdraw cash at a Canadian ATM machine (with our US bank issued ATM card) because you will get the current rate. If you try to exchange money at most places, they will give dollar for dollar (\$1.00US = \$1.00CA). We also pay for everything with credit/debit cards just because the rate fluctuates. Canada has \$1.00 and \$2.00 coins, not bills.

If bringing presents, DON'T WRAP THEM!! They will be unwrapped and searched to make sure it is not contraband.

The trailer trucks in Canada carry more weight and are larger than in the US, so you need to be more cautious.

PGR 000159

When ordering at a restaurant, order everything at once because you will never see the waiter again... they don't give ice in your soda... French fries come with gravy... yes, the beer WILL knock your socks off - it's a lot stronger... Canadian Heinz Ketchup is yummiier than US Heinz Ketchup... they say "eh" at the end of every sentence... and remember that the US border guard can keep you from coming home!

HOW ARE FLAGS DISPLAYED IN CANADA?

Basically, in the same manner as in the US with the Canadian flag taking precedence over the US flag.

No flag, banner or pennant should be flown or displayed above the Canadian Flag.

Flags flown together should be approximately the same size and flown from separate staffs at the same height.

The Canadian Flag should be given the place of honor when flown or displayed with other flags:

- When two or more than three flags are flown together, the Canadian Flag should be on the left as seen by spectators in front of the flags; if a number of countries are represented, the Canadian Flag may be flown at each end of a line of flags.
- When three flags are flown together, the Canadian Flag should occupy the central position, with the next ranking flag to the left and third ranking to the right, as seen by the spectators in front of the flags.
- Where more than one flag is flown and it is impossible to hoist or lower at the same time, the Canadian Flag should be hoisted first and lowered last.

When the National Flag of Canada is raised or lowered, or when it is carried past in a parade or review, all present should face the flag, men should remove their hats, and all should remain silent. Those in uniform should salute.

We hope this FAQ has answered many of your questions. Please feel free to contact your SC or another, more experienced member in your state with questions. The members of the National Board are available for questions also.

Advertisement

PGR 000160

Copyright © 2005 -2006 by Patriot Guard Riders Terms Of Use Privacy Statement

PGR 000161

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 5



Sunday, October 22, 2006

...: PGR FAQ :...

Search

Register L

Navigation

PGR FAQ

Home

About Us

Letters of Appreciation

Leadership Contacts

Forums

Photo Gallery

Media/Press

Fallen Members

Events

Corporate Sponsors

Links

PGR Store

PGR FAQ

Special Events Store

PGR FAQ

Welcome to the Patriot Guard Riders!

As our mission statement says:

We don't care what you ride, what your political views are, or whether you're a "hawk" or a "dove". It is not a requirement that you be a veteran. It doesn't matter where you're from or what your income is. You don't even have to ride. The only prerequisite is **Respect**.

Our main mission is to attend the funeral services of fallen American heroes "as invited guests of the family" Every mission we undertake has two basic objectives:

1. Show our sincere respect for our fallen heroes, their families, and their communities.
2. Shield the mourning family and friends from interruptions created by any protestor or group of protestors.

We accomplish the latter through strictly legal and non-violent means.

As a new member you will have many, many questions. Please check this FAQ and the Forums carefully before posting your questions. There is so much information and traffic on the forums that cross posts are common. This FAQ has been compiled from questions posed on the forum, suggestions by other members, and policies adopted by our National Board.

MEMBERSHIP

PGR 000162

WHAT SHOULD I DO FIRST WHEN I JOIN?

Fill out your information in your profile. State/Ride Captains use this information to contact you.

HOW MUCH INFORMATION DO YOU NEED FROM ME IN MY PROFILE?

It is important that your contact information is up to date in the event we need to contact you. At a minimum you should have your full name, email, city and state. A phone number would be helpful too, if you don't mind. **No one but National and State Captains have access to this information**, so don't worry about it getting out. After you have logged in click on your name in the upper right corner of the screen and it will take you to your profile where you can update your information. This can also be accessed by entering the Forums. You will see a tool bar as pictured below. Click on "My Profile". There you will be able to update your profile and account information and manage your thread and forum subscriptions.

[Forums](#)
[My Profile](#)
[Search](#)
[Members](#)

ARE THERE ANY DUES OR MEMBERSHIP FEES?

No, membership is free. PGR is funded through purchases made from the PGR store, public donations, member donations and member businesses who donate. We also receive funding from the Google Ads in the Forums sections. These ads are in the banner and a sidebar on the left-hand side of the page. Downloading and using the Firefox browser also generates funds.

IS A DONATION TAX DEDUCTIBLE?

Yes. Patriot Guard Riders is a non-profit 501(c)3. Consult your professional tax preparer or the IRS for rulings on deductions for donations to non-profit organizations.

WHAT IS CORPORATE SPONSORSHIP?

Some corporations have elected to support the PGR through sponsorship of operations and functions of the PGR.

DOES THE PGR HAVE ANY PRINTED INFO TO PASS OUT TO POTENTIAL MEMBERS?

Yes. You may purchase approved business cards from a PGR member located in the [Links](#) section of the Navigation Bar. National is also working on a brochure which will soon be available.

HOW DO I GET OUR CLUB'S WEBSITE LINK ON THE LINKS PAGE?

Send the link and a graphic to [Hardbite](#) and he will add it to the PGR site.

QUESTIONS FROM BUSINESS OWNERS:

PGR 000163

I OWN A BUSINESS THAT MIGHT BE OF INTEREST TO PGR MEMBERS. CAN IT BE LISTED ON THE WEBSITE?

Yes it can. Send an email to Hardbite@patriotguard.org with the URL and a graphic from your site including any information you want posted. They will get it posted to the Links section in the Navigation Bar on the Home Page.

DO I HAVE TO OFFER A DISCOUNT OT PGR MEMBERS?

Although many member businesses do, it is not required nor is it expected. If you offer a discount it is at your discretion.

DO I HAVE TO DONATE A PORTION OF THE PROCEEDS FROM SALES TO PGR?

Although some businesses do, this is not required nor is it expected. Many members do like to patronize member businesses that offer a discount or donate funds to PGR from those sales. Any donation is at your discretion.

WHAT IF I HAVE AN IDEA FOR A FUNDRAISER FOR PGR?

All suggestions for fundraisers are appreciated. Fundraising ideas can be posted at the **PGR Suggestions** Forum in the National Forum. Any type of fundraiser in the name of the PGR should be approved by National before it is actually implemented. Please read the Forums before posting, your idea may have already been suggested and it may already be in the works.

WILL I GET A MEMBERSHIP CARD?

No. The PGR does not issue membership cards at this time.

HOW WILL MY STATE CAPTAIN KNOW I'VE JOINED?

The National Board along with all the State Captains (SC) are listed in the Navigation bar on the Home Page under **Leadership Contacts>State Captains**. Open the link, scroll down to your state and email your SC to let him know you've joined. He/She also monitors the Regional Forums so if you post there to introduce yourself you may be contacted shortly. If you live in a state which does not currently have a captain you can post to the **Regional Forums** in your area and let everyone there know you're new. Post to the **Introductions and Shout Outs** Forum and introduce yourself.

IS THERE A DRESS CODE OR REQUIRED UNIFORM?

No. Dress for safety, comfort and respect. Many suggestions have been made regarding standard shirts or clothing but National has not adopted a dress code or policy for our members. A family may have a special request due to ethnic or religious practices for a specifically colored shirt or other form of attire. Since our mission is "respect," we do everything in our power to honor those requests. Keep in mind that we are there to respect the family, and check your vests for any patches which may contain offensive language. Those patches can be covered with masking tape for the duration of the

PGR 000164

mission. Many members have decided to use a vest specific for PGR missions. There are several beautiful patches being offered as fundraisers for the PGR. You will find members selling those patches in threads on the [PGR Suggestions Forum](#) and in the [Links](#) section on the Navigation Bar on the Home Page.

DO I NEED SPECIAL CLOTHING TO ENTER MILITARY INSTALLATIONS?

Some missions do take place on military installations. These installations do require certain safety equipment for entrance to the base. This includes, but is not limited to, a DOT approved helmet, long sleeve shirt, full-fingered gloves, boots covering the ankle and long pants. Many installations also require a bright colored or reflective safety vest or belt.

CAN I WEAR MY M/C COLORS?

Some Law Enforcement Agencies have a "No Colors" policy for large groups of motorcyclists. You will be notified of this in the mission thread. Please respect their request and leave your colors at home. If you are unable to do so due to requirements of your club, we understand completely but ask that you stand down for the mission.

If you belong to another riding club please check with them before placing the PGR patch and pins on your club vest. Many clubs do not allow other patches and pins on their vests. They may also have restrictions regarding where you may wear your vest with their patch.

PGR BACK PATCH

The PGR is NOT a Motorcycle or Riding Club. This back patch is not representative of, nor is it an indication that PGR is a Motorcycle or Riding Club. We do not earn this patch but purchase it from our store. Back patches representing M/C's or R/C's are earned by their members during the year or two in which they "prospect" or serve as a prospective member. They work hard to earn the right to wear the patch.

If you choose to purchase or wear the back patch please check with your state captain to make sure that he/she has contacted the COC in your state for approval of the patch BEFORE you purchase the patch. COC in some states are recommending that the back patch not be worn due to safety concerns for our members. Trust in their judgment, they are more aware of the attitudes of the individual M/C's than we are. **WARNING:** If you are asked to remove the garment on which you are wearing the patch, please do so immediately, and without contention, for your personal safety.

For more information regarding the 1%'ers, M/C's, R/C's and their traditions and policies please go to **M/C educational information**.

ARE THERE REGULAR CHAPTER MEETINGS?

No. The PGR is a volunteer organization not a motorcycle club. We do not hold regular meetings however many folks organize informal area or state get-togethers and meet-n-greets. You will find information regarding these in your

PGR 000165

Regional Forums. Each region contains a thread specific to your state.

SINCE I AM A MEMBER CAN I USE THE PGR LOGO AND NAME?

The PGR logo and name is copyrighted and restricted to specific use. Anyone wishing to reproduce the logo or name for personal and/or business use in graphics of any form **MUST** receive permission from National, contact Jeff "Twister" Brown jbrown@patriotguard.org before using it.

WHERE DO I PURCHASE PGR ITEMS?

The link to the **PGR store** is located in the Navigation Bar on the left-hand side of the Home Page. You will need to create a separate log-in from the one you use to log in to the PGR main site. Once you have entered the store please take the time to familiarize yourself with the policies and procedures of the store. Many of the questions you may have about the store will be answered there.

PGR STORE CHANGEOVER ISSUES

The new Online PGR Store is automated in many respects. This assures fewer errors, faster processing and more accurate delivery of the items you order. Included in the automation is inventory. When an order is received for an item, the system automatically reduces the inventory level of that item by one. All orders, including back orders, are automatically processed on what's called the FIFO method (First In-First Out). What this means to you is pretty simple... Your order is filled in the order in which it was received, regardless of whether it's in stock or back ordered. If an item is on back order, and you wait to order it till you see it's in stock, there may be a hundred people who have already ordered it and will be ahead of you. So, if something shows as on back order, and you want one, go ahead and order it and you'll be in line as soon as they arrive. In an attempt to reduce shipping expenses, the system allows for only two shipments per order; an initial shipment of all items currently in stock when the order is received, and one final shipment only when all B/O items are in stock.

During the change over from the old to the new PGR Store, inventory levels are "iffy" because the "old" and "new" stores are different software systems. Back orders being filled from the old store do not automatically reduce the inventory levels in the new store records. Therefore, it is possible that items show "in stock," but are actually already depleted. As time goes on and the "old store" orders are processed, this will clean itself up. When a shipping label is pulled up for printing, the order is automatically transferred to the "Shipped" category in your account records. This can result in some instances where your account shows an order as having been shipped when it actually was not. It will be shipped as soon as the items arrive in stock. Please bear with us as we work through these issues. The new system looks like it will work great as soon as all of the old store orders are finally processed.

Please keep in mind that the PGR Store is not Wal-Mart. We process orders after our "9 to 5" jobs and other PGR responsibilities. We're working as fast as we can, but it may take up to 4 weeks for us to receive items on back order.

REGARDING THE PGR ONLINE STORE:

PGR 000166

A number of people have asked if they or a friend can duplicate some of our stuff for free to help the cause. Our PGR name and logo is copyrighted for a reason. The revenue generated from the sale of PGR products enables us to operate this site and continue to grow the organization without any dues, donations or fees. We also have other plans down the road.

All associations have their own stores (VFW, AL, RFTW, etc.) and do not allow reproductions for the same reasons. We've also tried to keep our pricing lower than comparable products through other associations. I hope you understand and support this policy.

WHAT IF I HAVE AN IDEA FOR AN ITEM FOR THE STORE?

Suggestions for the PGR store can be posted in the National Forums under the heading [Patriot Guard Store](#). Check the threads in that Forum before you post. Your idea may have already been suggested and the answer will be there.

WEBSITE QUESTIONS

ONCE I'VE JOINED HOW DO I LOG INTO THE SITE?

The Log-in is located in the far upper right hand corner of the Home Page. If you Log in and check the box to "Remember Login" you will not need to log in each time you visit the site.

WHAT IS THE PHOTO GALLERY AND CAN I POST PICTURES THERE?

The photo gallery is reserved for PGR missions and events only. On your missions you may take photos and or videos with respect. Please respect the family and fallen hero by not photographing them or the casket unless specifically requested by the family. Photos such as these will not be posted in the gallery in respect for our hero unless the file is specifically labeled that family permission has been obtained.

Please, please please, (did I say please ?) limit your camera resolution to 640x480. This is the standard viewing size for internet pics and will turn out just fine. Secondly it limits the file size to below 1mb. I've been receiving some incredible pictures but at huge resolution resulting in 1-2mb per picture. Our server isn't infinite in storage space and I would hate to have to start culling mission photos for space considerations.

Place your photos in a .zip file labeled with the hero's name and location and mail to photos@patriotguard.org and we will get them posted up ASAP.

To do this with Windows OS, once you have the pictures uploaded to your computer, navigate to the folder you saved them in. While holding down the shift key, highlight each and every pic file you want to send. Once they are all highlighted, right click on the last one highlighted and select send to/compressed file. This will create a .zip file for you to attach to your

PGR 000167

email.

Files should be no larger than 4-6 MB to ensure the photos will be received.

NAVIGATING THE PHOTO GALLERY

Click on the folder you would like to view. Once you have finished viewing that folder you can return to the main gallery by clicking the small arrow on the very left-hand side of the tool bar. To exit the gallery and return to PGR home page click the house icon in the upper right hand corner of the tool bar at the top of the gallery. The tool bar also allows you to email, download images in two sizes, and view images in a slideshow format.

WHAT ARE THE FORUMS AND HOW DO I USE THEM?

The forums are message boards set up for us to communicate with each other. They are **"Public Forums,"** so anyone can read them, including the families of our fallen heroes. Please take a few moments to familiarize yourself with the different Forums and their content. They each serve their own purpose. Stop in to the Introductions and Shout Outs and tell us a little about yourself. Make a connection in your Regional Forum also. There you will meet members in your area, learn about specific activities in your state and let others in your location know you're a new member. **Please check all pages of the threads before you post your suggestions or questions. You may find the answer already there.**

Once you have entered a Forum by clicking on its name you may subscribe to it by checking the **"Email me when someone posts to this forum."** You will find this located at the top of the forum on the left-hand side. If you don't wish to subscribe to a Forum but want to keep track of a particular thread you may check the box labeled **"Email me when someone replies to this thread"**. You will need to enter the thread by clicking on it in order to subscribe to it.

WHAT ARE ALL THESE GOOGLE ADS IN THE BANNER AND SIDEBAR OF THE FORUMS?

This is another way to fund PGR. PGR does not have control of the ads placed in the Banner and Sidebar and can not remove specific ads from these areas. Clicking on the ads sends funds to PGR.

There have been times when the Banner Ads have caused a slow down on navigation of the site. This problem can be fixed but will only work for users who are using the Internet Explorer browser, are running Microsoft Windows XP, and have their system up to date to at least Service Pack 2 (if you don't you won't see the "Manage Add-ons" under tools) If you are running Windows 98/ME or Windows 2000 this fix is not available to you. For I.E. ver. 6 users, since the ad uses the Macromedia Flash browser plug-in to function, you can simply disable it within the browser which will kill the ad and free your surfing within the PGR forum back up.

In Internet Explorer click on , , Show "Add-ons that have been used by Internet Explorer." Look in the list in the window until you see something labeled like "Shockwave Flash Object," highlight it, and at the bottom of that window under settings, set it to "Disable." You may have to restart the browser for it to take effect, but the Flash add should be gone and surfing should return to normal. Just remember to re-Enable your Flash plug-in if you go elsewhere on the web to a page

PGR 000168

that uses properly coded Flash that doesn't hang up I.E. Not everyone should have to download and install a different browser just because of poor coding.

WHAT IF MY EMAIL ADDRESS CHANGES?

Log in to the site and click on your name in the upper right hand corner next to the Log in. This will take you to your Account Profile where you can make any changes necessary.

CAN I CHANGE MY SCREEN NAME?

No, your Screen Name is the User ID for your account. In order to change this you must un-register and then register using the new name of your choice.

I CAN'T REMEMBER MY USER ID OR PASSWORD. HOW DO I RETRIEVE IT?

Our Help Desk is accounts@patriotguard.org. Send an email requesting your information. We will look it up for you, reset your password and send you an email with the information.

FORUM TOOLS

Delete Edit Quote Reply Alert

Directly above your post on the right-hand side you will find the tool-bar indicated above. You may delete or edit your own posts. Forum moderators are the only ones who can delete/edit posts of other members. If you find a post to be offensive, you may notify the Moderators by clicking on the Alert button directly above the offending post. **Please include your screen name AND full name as a signature to your alert.**

If you would like to reply directly to a specific post you may click on the Quote button directly above that post. This will highlight that post and place it in your reply. Type your reply and click Submit. If you simply wish to reply to the thread you may click on the Reply button.

QUICK REPLY

Located at the bottom of the thread is the Quick Reply. This allows you to reply to the thread but does not allow for uploading files and pictures or to post an active link. You must use the Reply button at the top of the thread to do so. Please keep posting of pictures and graphics to a bare minimum since this just eats up bandwidth. Mission pictures are not posted in Forums. They must be submitted to the webmaster in a specific format for upload to the [Photo Gallery](#). Further instruction for posting mission photos is contained in this FAQ under How Do I Use the Confirmed Mission Forum.

PGR 000169

PRIVATE MESSAGES (PM)

You can contact another member privately by using the Messages box located beneath the Navigation Bar on the left-hand side of the forums pages. It can also be found on the Home Page in the upper right-hand side beneath your name. You may also send an email to a member through the forums by clicking on his/her screen name highlighted in blue to the left of his/her post. This will take you to their profile where you will find their email address. Some members do not list email addresses so you may need to use the PM feature to communicate with them.

MORE TOOLS

[My Profile](#) [Search](#) [Members](#)

This tool bar is located in the upper-right hand corner of the Forums pages. The "My Profile" link will take you to your profile where you can make any changes necessary. You can use "Search" to look for a particular post or subject on the forums. The "Members" link will take you to an alphabetical listing of all PGR members.

FORUM ETIQUETTE

Please keep in mind at all times when posting that these are **public forums**. Although you must log in to post to the forums anyone can read the messages. Families often times check the forums for communications regarding their loved one. The general public as well as prospective members are also able to access these forums. Law Enforcement, Clergy, and Media also check our site. Please keep the language of your posts clean. Political debates and statements are discouraged and posts containing these types of messages will be deleted by our Moderators. While references to protesters are sometimes necessary, discussions regarding protesters are discouraged, they are not the real reason we are here. Our mission is to honor and show respect to the fallen heroes and all veterans. We have been praised time and again for our professionalism on our missions. That attitude should carry over into our communications on our website. If you have a problem with a post or another PGR member please notify the moderators by clicking on the ALERT button found directly above the post in question. **Please include your screen name and full name as a signature to the alert.**

WHAT DO ALL THESE ABBREVIATIONS AND TERMS MEAN?

SC - State Captain. The State Captain monitors and sets up missions. There generally is only one State Captain per state. The SC makes contact with Law Enforcement (LEO), the Family, the Church, and Funeral Directors, to set up a mission, but may delegate that to a Ride Captain (RC) if absolutely necessary. State Captains can recruit as many Ride Captains as they feel they need to accomplish our objectives.

PRC, TRC & RC - Permanent Ride Captain, Temporary Ride Captain and Ride Captain. SC's recruit RC's in varying parts of the state to help recruit riders and groups in their areas and help with

PGR 000170

missions. A Ride Captain can be temporary RC (filling in if a SC or another PRC cannot make a mission) or permanent RC. Permanent RC's are listed on the Captains page and have full access to member's lists.

Maroon PGR Ball Caps. Maroon PGR ball caps are worn by State and Ride Captains to make it easy for mission attendees to identify them.

UG - Uninvited Guest. An UG is any individual or group that is there to disrupt the services of a fallen hero. This is our preferred term to be used for any protesters.

LEO and LE - Law Enforcement Officer and Law Enforcement. Local, County, and State Law Enforcement Officers are the folks who make the majority of missions safe. Without their assistance, the PGR would not be as successful as it is.

CAO - Casualty Assistance Officer. These are the military men and women assigned to help the family.

COC - Confederation of Clubs

This is an organization that was founded to oversee all motorcycle clubs in the United States. It is made up of representatives from many, if not all, of the M/C's in the country. It is not a governing body per se, but a resource to which various M/C's may go to resolve disputes and issues, and also serves as an advocacy group for various clubs. Some states do not have a COC but may have another organization similar to it. Some states, due to their size, may have more than one COC.

KIA - Killed in Action

MIA - Missing in Action

POW - Prisoner of War

CAGE - A car or truck, enclosed vehicle.

DOD - United States Department of Defense. This is the agency from which we get our notices of KIA service members.

ROAD GUARD - Assists the RC with traffic control such as blocking intersections from cross traffic.

PGR 000171

They also keep an eye out along the line for potential problems.

TAIL GUNNER - This is usually the last rider of the group. His/her responsibilities may include, but are not limited to, staying alert for possible problems within the group, keeping the group in formation and up to speed, assisting with Road Guards. Many may be able to communicate with the RC by CB to report any accidents or problems.

STAND DOWN - This usually means that a watched or confirmed mission is cancelled. This can be because a family has requested a family-only service or the service has been moved to a different state. If the service is moved to a different state the mission thread will be changed to reflect the move.

HOW DO I USE THE WATCH LIST FORUM?

POSTING KIA NOTICE

It has been determined by National that to avoid confusion, that only the Web/Forum administrators will post KIA Notices confirmed by DOD in this forum. If you receive or notice a media story of a KIA not yet posted please refrain from posting. Our troops have embedded media reporters with them and there is no way to determine how the story got out or if the family has been notified properly if there is no DOD Confirmation Release. Instead, please forward the story to your state captain and courtesy copy web@patriotguard.org

REPLY POSTS

In order to help cut down the confusion and thread buildup please refrain from posting such as "Keep me posted," or asking if there is pertinent info on a KIA yet. The state captains and ride captains are working diligently in the background to get this info to you. **SCs and RCs** once you have pertinent information that a mission is confirmed please make a reply post as such and send a courtesy email to web@patriotguard.org. At this time the thread will be moved into the Confirmed Mission Rides forum after the mission has been confirmed by the **SC or RC**.

To help keep the Mission threads on track please limit it to mission information only. Idle conversations and meet and greets can be posted to the **Off Topic** or **Regional** sections of the Forums. This helps keep the information on mission, times and places easy to find.

If you see a media report about services with times and locations please refrain from reply posting this as well. Instead please forward this info to your SC or RC and courtesy copy web@patriotguard.org

Web administrators have provided a new module to the website in the Private Message feature. You can easily and quickly send your SC or RC a PM now.

PGR 000172

HOW DO I USE THE CONFIRMED MISSIONS FORUM?

ITINERARY POSTING

SCs and RCs will be posting Mission Itinerary information as it becomes available. Once this is posted Web Administrators will re-post the Itinerary to the **first post** in the thread and make an edit to the subject line that says Itinerary Update. The date will also be added to the subject line.

REPLY POSTING

Feel free to post any questions you have at this time pertaining to the mission itinerary, staging locations etc. In order to cut down on confusion and thread buildup though, please refrain from posting such as "Keep me posted," etc. Please use the Private Message function or emails to communicate to your SC or RC's.

If you see a media report about services with times and locations please refrain from reply posting this as well. Instead please forward this info to your SC or RC and courtesy copy web@patriotguard.org.

To help keep the Mission threads on track please limit it to mission information only. Idle conversations and meet and greets can be posted to the Off Topic or Regional sections of the Forums. This helps keep the information on missions, times and places easy to find.

RIDE REPORTS

Once a mission is complete the subject line will be edited to read Mission Complete. **At this time please refrain from posting any afterthoughts until the SC or RC has had a chance to gather thoughts and post a Ride Report.** At this time the thread will be locked and the Ride Report thread will be available for your comments and thoughts. The Mission thread will remain in the Confirmed Mission Rides forum in a Mission Complete status for 3 days to reflect on the Home Page sidebars and direct further readers to the Ride Report Thread. It would be nice if you could check in on the Ride Report once you have arrived home so your SC knows you are home safe and sound.

MISSION PHOTOS

On your missions you may take photos and or videos with respect. Please respect the family and fallen hero by not photographing them or the casket unless requested by the family. Photos such as these will not be posted in the gallery out of respect for our hero.

Please refer to the "WHAT IS THE PHOTO GALLERY AND CAN I POST PICTURES THERE?" FAQ for information on posting mission photos.

CAN I RECEIVE EMAIL NOTIFICATIONS OF MISSIONS?

PGR 000173

Our SC/RC's are extremely busy making arrangements for missions in their areas. Although some State Captains are able to set up email lists for notification it is not done as a rule. The SC/RC's are incredibly busy working behind the scenes to contact family, map out routes, recon staging areas and coordinate with local Law Enforcement. They simply don't have time to email all members in their state. While many SCs do a single alert email to his state/area members this is not always the case. Please keep in mind that this is a volunteer organization and most of these folks also have jobs, families, and other PGR duties. It is your responsibility to keep track of possible missions.

You can receive blanket email notifications by subscribing to the Watch List. Possible missions are posted there until they become a Confirmed Mission. Click on the Watch List forum. In the top left-hand corner you will see **"Email me when someone posts to this forum."** Put a check in that box. Any posts to that forum will be sent to the email address you have listed in your profile.

Several members have set up a separate email address for PGR communications due to the high volume of information they wish to receive from the site. You may also want to keep track of other threads that are of interest to you. This will allow you to keep PGR communications separate from business and personal email. If you do not wish to receive blanket email from the Watch List you will need to log on to the site and check the list periodically. Information can change rapidly for missions so it is suggested that you check at least once a day. If you find a mission in your area you can enter the thread for that mission and subscribe to that thread by checking the Email notification box as described above.

WHAT IS THE DOD WEBSITE?

This is the **US Department of Defense** website. On the right hand side of the site under Press Resources you will find the link for Releases. An official notification of KIAs comes from the DOD. Once the DOD has released the information this means that all family members have been notified and the Moderators then post the listing to the Watch List. You may subscribe to the DOD website, however, **ONLY** the moderators will post the official notices to the PGR website. The missions are posted to our site in the same format used by the DOD so they are found more easily by people using a search engine such as Google.

WHAT TYPE OF MISSIONS DO WE DO?

Our main mission is to honor our fallen heroes, their families, and communities by attending memorial services and funerals. We are there to pay our respects and to shield the families from any interruptions by uninvited guests. While this was the original purpose of the PGR at its inception, our missions have expanded to include many other activities. Other programs are being implemented frequently. You can check the **Special Missions** Forum in the Ride Information section for updates. A link can also be found for specific special programs in the Navigation Bar under **About Us>Our Programs**.

WHAT IS A SPECIAL MISSION AND WHAT IF I HAVE AN IDEA FOR ONE?

The PGR has evolved into a group that honors all veterans from all conflicts. We have added **Special Missions** to include welcome home escorts for returning military personnel and units, send-offs, parades, visits to veteran's retirement homes,

PGR 000174

hospital visits to wounded vets and many other events. If you have an idea for a Special Mission you can contact your SC with the information. You will find more information regarding special missions under the [Ride Information](#) Forums.

WHAT IS HELP ON THE HOMEFRONT

[Help on the Homefront](#) is a charitable function which aids wounded veterans and their families. Ronny "Bear" Awtry is the one to work with regarding this wonderful mission.

MISSIONS

HOW DO I FIND OUT ABOUT MISSIONS IN MY AREA?

You will use the Watch List and Confirmed Missions List. You may access these lists one of two ways. On the Home Page you will find a column on the right-hand side of the page. Click on the Watch List or Confirmed Missions List heading and it will take you to the respective forum. You can also access the lists by placing your cursor over the Forums link in the Navigation bar on the left-hand side of the page. A drop down menu will appear and you can then choose which Forum to enter by clicking on it. For further instructions please see the FAQ section for Forum Use.

WHAT CAN I EXPECT ON A MISSION?

This is a time of mourning and it is be very emotional for the family, community and the PGR members. It can get overwhelming so just let it flow. You will see many of your fellow members in tears or otherwise greatly affected. Don't hesitate to give a hug or offer a hand. We are all feeling the same emotions. You will also feel a great sense of pride in being there.

Your State or Ride Captain will have set up a staging area for everyone to meet. Please make sure you are there on time, fueled up and have already performed your pre-ride safety checks. Your State/Ride Captain will hold a briefing for any instructions and last minute information you may need. Please be sure to check the thread for that mission thoroughly just before you leave to make sure there aren't any last minute changes for times and locations. It is recommended that you print out the itinerary posted in the thread to take with you. Many SCs will post Mapquest links within the thread to assist you with directions to various staging areas.

The normal formation, but subject to your State or Ride Captain's discretion, with National approval, will be bikes with large flags in front, the rest of the bikes, then cars or other vehicles. In most cases there will be a pre-designated place for us to park, if not please DO NOT park in areas close to the building where the family and friends should park.

Once at the service there may be changes as to what we do or where we can help depending on what the family, funeral director, or LEOs want or need, so be listening up for the State or Ride Captain to make more announcements. On one mission we helped direct parking because the funeral home did not have enough people.

PGR 000175

WHAT IS A LIABILITY WAIVER?

It is an agreement that you ride the mission at your own risk without holding Patriot Guard Riders liable for any accident or injury resulting from your participation in the mission or event. You will be required to sign a liability waiver list in order to ride/drive or attend a mission. The list is made available at each mission and must be signed at each mission.

DO WE ATTEND THE ACTUAL SERVICES?

Many families invite us into the chapel to attend the actual service. It is up to you if you choose to do so. Your SC/RC will let you know if the invitation has been offered.

CELL PHONES

Please turn your cell phones off or to "silent" during the mission. If you must make or take a call please remove yourself from within the sight and hearing of the family and other participants until your call is complete.

SMOKING/EATING/DRINKING

Please pack your trash back out with you if you can't find a proper receptacle. Put your butts in your pocket until you can find a can or ashtray. The use of a film canister or baggie has been suggested to discard butts. Absolutely NO consumption of alcohol during a mission. Respect includes respect for the church, funeral home or cemetery grounds.

YOUR THROTTLE

If you must leave a mission early please choose an appropriate time preferably immediately before or after the services. Always remember this is about respect and keep your throttle to a minimum when starting and leaving the area.

WHAT DO I BRING TO A MISSION?

Make sure you bring water to drink. If you know it's going to be a long day bring some snacks or even pack a sandwich. Some folks have been known to generously provide water and snacks during the mission but this is not expected of them and it is your responsibility to provide your own. If, by chance, they have a donation jar located near the snacks feel free to drop something in to help defray their costs. Many also choose to donate back to the PGR. You are under no obligation to make the donation.

You may want to bring your own flag. A collapsing pole is recommended for ease of carrying if you do not wish to attach it to your bike. **JTDent** offers a discount to PGR members. Most State or Ride Captains will have a number of flags with them but the more we have the better. If you need flags check the [Links](#) section in the Navigation Bar for both bike flags and 3'X5' flags.

Other equipment like, cold weather gear, rain gear, leather good, patches and business cards are avail in the [Links](#).

PGR 000176

These are made available by PGR members at special pricing in most cases below wholesale. PGR flags are available through the PGR store.

You can purchase different types of flag poles and mounts. Check out the Forum thread [Flag Mounts](#). You will find a wealth of information there for mounting flags on your bike.

Sunscreen and a small first aid kit are highly recommended.

HONORING SPECIAL RELIGIOUS OR ETHNIC TRADITIONS.

Our main purpose is to honor the fallen hero. We already do that with our presence and display of flags. There is no need to further honor religious or ethnic traditions of the family or community unless a specific request is made. If a family or community chooses to offer their thanks with a patch or other form of gift, as has been done on a previous mission, it is not up to us to return the favor. Gift-giving may be required by ceremonial traditions of certain ethnic groups. Some religious or ethnic traditions require clothing of a certain color. The family may make this request. Since our mission is to show honor and respect we make every effort to honor the family's wishes.

WHAT IS THE PGR PLAQUE?

The plaque is something that is presented to the families of the fallen service member. It says: "On behalf of a grateful America and the Patriot Guard Riders, please accept our sincere condolences on your tragic loss. May your pain be tempered by the knowledge that "NAME" is a true American Hero." Then it has the PGR emblem on the bottom. It is paid for by any revenue created by clicking on the ads on the sides of the website, or by some purchases from the PGR store.

WHAT IF A MISSION IS CANCELLED?

If a funeral mission is cancelled due to the family's request we DO NOT attend. This would be disrespectful to the family. If it is a public event you may attend as a citizen but we ask that you leave your PGR items at home, if possible. Our mission, first and foremost, is respect. Not only does that apply to families but also to the communities in which we live and serve.

ARE MISSIONS EVER LIMITED IN ATTENDANCE SIZE?

A family may wish to invite the PGR but only on a limited basis. Again, we do everything we can to honor the family's request.

DO I SALUTE AT MISSIONS?

It has been suggested that civilians should salute by placing their right hand over their heart. Many military personnel will give a hand salute or place a hand over their heart. While it has been customary that only military personnel in uniform should salute, recent changes in thought have led to giving a choice to those who have served. PGR maintains that the

PGR 000177

salute is your personal decision as long as it is in keeping with our mission of respect and honor.

HOW DO WE SHIELD THE MOURNERS FROM THE UGS?

If protestors are in attendance we simply hold our flags with our backs turned to the protestors. We, in no way, engage the protestor either verbally or physically. We may sing, rev our engines or say the Pledge of Allegiance but that is strictly up to the direction of the SC/RC. Take your cues from them.

WHAT DO I DO IF AN U.G. ATTEMPTS TO PROVOKE ME?

Stand with your back to them and ignore them. Your only function at the mission is to pay your respects to the fallen hero and his/her family.

CAN I BRING MY CHILDREN TO MISSIONS?

Yes. It is suggested that you use your best judgment with smaller children. If your child becomes restless please be prepared to remove him from the area so as to not disturb the services. Perhaps you and your spouse or a friend can agree to a plan of action before you attend the mission. Talk with your children before hand to prepare them for what may happen. You will find that they may be able to understand more than you think. Give them a flag of their own that is a size they can handle. Teach them some flag etiquette. This can be a positive experience for your child.

FLAG ETIQUETTE

The flag that is of the utmost importance is our national flag, to which the greatest respect should be paid. No other flag can be flown above the national flag.

It is imperative that no one show disrespect to the national flag.

The national flag should never be "dipped" or lowered to any person or thing.

However, Regimental colors, State flags, and organizational or institutional flags can be dipped as a mark of honor. The flag should never be allowed to touch the ground. Flags are displayed in a specific order with the US flag always being in front of a line or on its own right. If, in a flag line, you are in doubt of your position please ask your SC or another member if you are in the correct position if you are holding a flag other than the US flag.

HOW DO I MOUNT FLAGS ON MY BIKE/CAR?

The American Flag is always mounted on its own right. The flag's own right is the side of the Canton, or blue field of the flag, also referred to as the Union. Other flags are mounted to the left of the American flag and at the same level or lower than the American flag. When several flags are used they are to be displayed in this order from the American flag's own

PGR 000178

right: US, other countries, states, counties, cities/municipalities, military branch, organization, and symbolic or personal. See the picture below for an example. This example also applies to cars and trucks.

This is directly from the U.S. flag code:

SEC. 3 That the flag, when carried in a procession with another flag or flags, should be either on the marching right; that is, the flag's own right, or, if there is a line of other flags, in front of the center of that line.

- (a) The flag should not be displayed on a float in a parade except from a staff, or as provided in subsection (j)
- (b) The flag should not be draped over the hood, top, sides, or back of a vehicle or of a railroad train or a boat. When the flag is displayed on a motor car, the staff should be fixed firmly to the chassis or clamped to the right fender.
- (c) No other flag or pennant should be placed above or, if on the same level, to the right of the flag of the United States of America, except during church services conducted by naval chaplains at sea, when the church pennant may be flown above the flag during church services for the personnel of the Navy. (See Public Law 107, page 4)

Present Arms -Salute or put your hand over your heart, whatever you are comfortable with.
if you are a flag bearer, do not salute or cover your heart.

The US FLAG is presented straight up with no dip whatsoever and no salute will be hand rendered when bearing the flag. All other flags including PGR flag will be dropped to a horizontal position.

Cover - headgear, hats. Some members feel this includes do-rags. Covers are not required to be removed during present arms in an outdoor environment.

Covers should be removed for prayers.

HELMET LAWS

WHICH STATES HAVE HELMET LAWS AND WHAT ARE THEY?

Listed here you will find all the helmet laws for all 50 states. Further information on the actual statutes is available [HERE](#).

PGR 000179

While some states seem to have no helmet law they actually do require a helmet unless specific insurance requirements are met. Please check laws in individual states for specifics.

Of the fifty states, only 4 are 100% helmet law free! :

Colorado, Illinois, Iowa and New Hampshire

Of the other 46 states, 20 have full helmet laws for all motorcycle riders:

Alabama, California, Georgia, Louisiana, Maryland, Massachusetts, Michigan, Mississippi, Missouri, Nebraska, Nevada, New Jersey, New York, North Carolina, Oregon, Tennessee, Vermont, Virginia, Washington, and West Virginia.

19 States have helmet laws that exempt adult riders, riders over the age of majority - 18 years old and over. Those states are:

Alaska, Arizona, Connecticut, Delaware, Hawaii, Idaho, Indiana, Kansas, Maine, Minnesota, Montana, New Mexico, North Dakota, Ohio, Oklahoma, South Dakota, Utah, Wisconsin and Wyoming.

There are 7 states that require helmets for riders between the ages of 18 and 20.

Arkansas, Florida, Kentucky, Pennsylvania, Rhode Island, South Carolina, and Texas.

MISSION SAFETY

WHERE CAN I GO TO LEARN MORE ABOUT GROUP RIDING?

The Motorcycle Safety Foundation has excellent courses on group riding. Sign up for a class and hone your riding skills. Some Owner's Groups also give you a gift certificate for merchandise after you have taken the classes. This link contains three excellent videos that you can watch to get an idea of what is required for basic and group riding. Scroll down below the US map to the videos marked WATCH.

WHAT IS A CHASE VEHICLE AND WHAT DO THEY CARRY?

A chase vehicle is a car or truck which carries extra equipment for a group of motorcycle riders. This is a *suggested* basic list. You may not be able to carry all items listed. You may have more than one chase vehicle per mission and you can split the list with another vehicle.

For People

- Protein snacks

PGR 000180

- Water
- Bottled water (bottles of water in an ice chest)
- Ice
- Gatorade
- Well-equipped First Aid kit to include:
 - Aspirin
 - Ibuprofen
 - Electrolyte tablets
 - Benadryl
 - Blanket
 - Towels
 - Latex gloves
 - Snap and shake cold packs
 - Space blanket
 - Antibiotic cream
 - Band-aids
 - Gauze pads
 - Bandage tape
 - Scissors

Stuff for Bikes

- Bungee cords
- Flag Tie Downs
- Ratcheting nylon tie-down straps.
- Fuses
- Duct Tape
- Electrical Tape
- Tow Rope
- Air compressor or air tank (for soft/flat tires),
- Tire Patch/plug kit
- Highway markers/flare,
- Reflective vests (for folks having to direct traffic around a break-down, etc.),
- Flashlights (the new no-battery type),
- CB radio,
- Pre-paid cell phone
- Basic tool kit to include SAE and metric tools
- Loctite
- Jumper cables

PGR 000181

- Battery charger
- Low jack with a flat plate that would go under a bike.
- Gasoline 1 - 2 gallons
- Crankcase oil
- Hypoid Gear oil
- Bailing wire
- Zip-ties / Wire Ties
- Assorted Hose Clamps (diff sizes)
- W/D 40
- Rags/Towel
- Hand Cleaner
- Extra Flags and poles

Stuff for Chase Vehicle

- Large caution sign on the rear of the truck
- Revolving yellow lights on top (check local laws)
- Two 7" x 20 yellow w/black stripe vertical caution signs to hang on either side of the tailgate

WHAT ARE SOME OF THE "COMMANDS" AND TERMS I HEAR DURING MISSIONS?

Kickstands up, Saddle up, Clutches out - This means we're leaving.

Present Arms - Stand respectfully with your flag, salute or put your hand over your heart, whatever you are comfortable with. If you are a flag bearer, do not salute or cover your heart. The national colors are presented straight up with no dip whatsoever and no salute will be hand rendered when bearing the flag.

Cover - headgear, hats. Some members feel this includes do-rags. **Covers are not required to be removed during present arms in an outdoor environment.** Covers should be removed for prayers though.

Parade Rest - relax

OTHER COUNTRIES

PGR 000182

DO WE RIDE IN CANADA?

We have several Canadian members but, to date, have not ridden a mission in Canada though this is changing. National is working on a network for a Canadian branch of PGR. As of the writing of this FAQ we have one mission on the Watch List.

WHAT DO I NEED TO CROSS THE BORDER TO AND FROM CANADA?

- Driver's license or state ID for every adult in the vehicle should have birth certificates for all minors. Passports are going to be required within the next few years.
- No fireworks, weapons, firearms.
- If you have a DUI or OUI or any felony, you can be denied entry to Canada.
- You must have proof of insurance (even though they usually don't ask for it at the border).
- Speed limits are in kilometers!!! 100 km/h = 60mph
- As with everything, you need to be polite and pleasant, because if you give any attitude, you will encounter problems entering either country.
- All Canadian provinces have universal motorcycle helmet laws.
- Some smaller border crossings aren't open 24 hours.
- Radar detectors are illegal.

When physically going through the border crossings, at minimum, ALL occupants are going to be asked where they're from, where they were born, where are they going, how long are you staying... but they can ask any other question they want. 9 times out of 10 you can get right through, but it is in their right to have you pull over and they will search the vehicle THOROUGHLY! Sometimes it's easier to avoid crossing at the larger "main" border crossings and going through some of the smaller points of entry instead, the guards don't seem as stressed.

Going to Canada, you can take 1 carton of cigarettes and 40 oz of liquor or a case of beer, preferably purchased at the "Duty Free" store at the border. Coming back, you can bring the same amounts back, but only if you've been in Canada for over 48 hrs (if it's less than 48 hrs, you would have to pay taxes on it). After 48 hours in Canada, you can bring back up to \$400.00 in purchases (keep ALL receipts) - if it's under 48 hrs, once again, you would have to pay taxes. You're not supposed to bring plants, fruits or vegetables either way, although it seems to be stricter coming back in the US. (When crossing, most places will record your license plate, so they know how long you have been there.)

Canada has lots of taxes, if you spend over \$200.00 on hotels or "large" purchases (not food, restaurants or little odds and ends), you can get the federal taxes (GST) back - there are forms available at the border and you can claim it there or you can mail it in. The receipts can be accumulated up to 2 years.

Most all Canadian's speak English. Those in the Province of Quebec speak French and prefer only French, and the signs

PGR 000183

are in French (where other Provinces have them in English and French).

Gas prices are almost double in Canada; fill up prior to crossing the border. Everything is metric, so gas is by the liter (approx 35% higher).

Right now the exchange rate is roughly \$1.00US = \$1.10CA. We have found that it's easier to withdraw cash at a Canadian ATM machine (with our US bank issued ATM card) because you will get the current rate. If you try to exchange money at most places, they will give dollar for dollar (\$1.00US = \$1.00CA). We also pay for everything with credit/debit cards just because the rate fluctuates. Canada has \$1.00 and \$2.00 coins, not bills.

If bringing presents, DON'T WRAP THEM!! They will be unwrapped and searched to make sure it is not contraband.

The trailer trucks in Canada carry more weight and are larger than in the US, so you need to be more cautious.

When ordering at a restaurant, order everything at once because you will never see the waiter again... they don't give ice in your soda... French fries come with gravy... yes, the beer WILL knock your socks off - it's a lot stronger... Canadian Heinz Ketchup is yummiier than US Heinz Ketchup... they say "eh" at the end of every sentence... and remember that the US border guard can keep you from coming home!

HOW ARE FLAGS DISPLAYED IN CANADA?

Basically, in the same manner as in the US with the Canadian flag taking precedence over the US flag.

No flag, banner or pennant should be flown or displayed above the Canadian Flag.
Flags flown together should be approximately the same size and flown from separate staffs at the same height.

The Canadian Flag should be given the place of honor when flown or displayed with other flags:

- When two or more than three flags are flown together, the Canadian Flag should be on the left as seen by spectators in front of the flags; if a number of countries are represented, the Canadian Flag may be flown at each end of a line of flags.
- When three flags are flown together, the Canadian Flag should occupy the central position, with the next ranking flag to the left and third ranking to the right, as seen by the spectators in front of the flags.
- Where more than one flag is flown and it is impossible to hoist or lower at the same time, the Canadian Flag should be hoisted first and lowered last.

When the National Flag of Canada is raised or lowered, or when it is carried past in a parade or review, all present should face the flag, men should remove their hats, and all should remain silent. Those in uniform should salute.

PGR 000184

We hope this FAQ has answered many of your questions. Please feel free to contact your SC or another, more experienced member in your state with questions. The members of the National Board are available for questions also.



Copyright © 2005 -2006 by Patriot Guard Riders Terms Of Use Privacy Statement

PGR 000185

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 6

JEFF'S FINAL CORNER

It's been an exhilarating, but an exhausting year. A year in which we have seen an awakening of the sleeping spirit of America, a rededication to the honor and dignity due all of those who serve our nation, and a unifying of those who have a desire to "do the right thing". Every PGR member should be justifiably proud of being a part of this.

Like all of you, I have taken a huge amount of time away from my family and business over this past year. It's time for me to heed my own words and "Pace Yourself". To this end, it is with a very heavy heart that I formally announce my resignation as Executive Director of the Patriot Guard Riders. This decision was also reached, in part, because a handful of very vocal people have expressed concerns over the possible conflict of interest in my owning the PGR Store and being the Executive Director. The business structure of the store has never been hidden and has been discussed "ad nauseam", but in an effort to delay any further controversy that takes time and energy away from our missions, I have chosen to step down and close the PGR store after the current inventory is depleted.

This has been one of the most difficult decisions of my life. I can't begin to put into words how much pride I have in all of you and what this organization has become and will become in the future. I will always view the founding of the Patriot Guard Riders and having had the honor of being your leader during this formative year as one of the high point of my life. I will continue to be honored to ride with you and stand by you until the day there is no PGR. After a great deal of pressure, Bill "Snap" Lines has agreed to assume the position of Executive Director and the board has approved. Snap, thank you for stepping up to the plate, Brother. The PGR is in good hands and I am confident in its leadership. I'm not going anywhere Folks. I will work closely with National during this transition period and continue to serve the PGR in the capacity as an advisor to the National Board.

Thanks for listening and Salute,

A handwritten signature in black ink, appearing to be "Jeff", with a long horizontal line extending to the right.

Jeff

posted @ Tuesday, November 07, 2006 8:42 AM by Twister

[Previous Page](#) | [Next Page](#)

[COMMENTS](#)

BROWN009964

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 2



Wednesday, June 18, 2008

Patriot Guard Riders

Standing For Those Who Stood For US



... ALL Forums ...

Code Amber Alert

jonmalle Log out

This is the Code Amber Amber Alert Ticker - CodeAmber.org near

Navigation

- Home
- About Us
- Leadership Contacts
- Letters of Appreciation
- Fallen Warrior Scholarship
- ALL Forums
- Help on the HomeFront
- Most Recent Posts
- Photo Gallery
- Media/Press
- Fallen Members
- Events
- Troop Support Partners
- PGR FAQ
- PGR Gear

Patriot Guard Riders Forum

[Unanswered Not Read My Forums Active Topics](#)

[Forums > Patriot Guard Riders - National > Letters from the PGR President](#)
[Subjects: From Snap 21 Nov 06](#)

☐ Email me when someone replies to this thread.
You are not authorized to post a reply.

[Forums](#) [My Profile](#) [Search](#) [Members](#)

Author

Waldo ●
Posts: 1325
Windsor, Co

Messages

21 Nov 2006 4:54 PM

To the PGR,

The last 10 days have been rough. I feel as if I stepped in it bigtime when I said OK to this job. I've heard from most of you and I've listened to each one. I hope I can serve you well this year. I want to point out that my term is for one year only, then my replacement will be elected by you, the real PGR, the members. More info on that to follow.

[Oldest First](#)

[Alert](#)

Dialup Homepage

Directory

Click to send an email to the departments below:

User Support

Moderators

Photos

Media

Submit Pictures of Day

Web Site Administrator

Communications Officer

Letters Of Appreciation

Help On The Homefront

Mission Request

Click on the link below to make initial contact with us regarding honor mission requests

Contact Us

Contact Arlington National Cemetery

YOU CAN TALK ABOUT US



BUT YOU CAN'T TALK WITHOUT US

12/25/06

I would like to address some topics with you and the best way for my old mind is by the numbers. So here goes.

1) The PGR store; We are going to TRY and have the new store up by New Years Eve. It will sell all the items it does now and more. And ALL profit will go to the PGR. We are going to outsource this store so that no member will have his hands on it. It will be overseen by a committee of members.

2) Jeff Brown has no affiliation with PGR except as a member. he is being removed as President of the Corp. He will no longer be our registered agent in Oklahoma. That place will be filled by a law firm.

3) We have received advice from our attorney that we can retain and use our name and logo without restraint. If you want a new logo, let us know but we don't have to.

4) The 501C3 is being handled by the attorney, people who have donated will be able to use the tax deduction.

5) By Laws are being prepared by the attorney and will be posted as soon as completed.

6) Our accountant will have all funds reconciled to post within three weeks. They will be posted at that time.

There has been a lot of bile and contention out there this week, most of it justified. But we are trying. You are right, trust is earned and until it is I invite any member to call me (a LOT of you do) and question anything you feel needs clearing up.

Let's try for less anger and spite on the web. If you want to chew me out I would rather you did it on the phone than on the site. I want to do well but I need your help.

Thanks for listening

LLRB

Snap

ICV/MC for PGR

Jason Wallin "WALDO"

Deputy Executive Director

Corporate Treasurer

Patriot Guard Riders

American By Birth
Biker By Choice
Patriot Forever!

Tact and Political Correctness were developed by those who lack the testicular fortitude to say what they really mean!


You are not authorized to post a reply.

Messages


0 Unread Messages
0 Read Messages

Forums > Patriot Guard Riders - National > Letters from the PGR President > From Snap 21 Nov 06


Active Forums 3.6



America Loves You Silk Rose



PGR Doo-Rag



PGR Armband



Welcome Home Silk Rose



Wounded Warrior Challenge Coin

Copyright © 2005 -2008 by Patriot Guard Riders Terms Of Use Privacy Statement

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 8

James O'Malley

From: Bill Richart
Sent: Thursday, October 04, 2007 9:10 AM
To: Ronny Awtry; Ed Mueller; exec
Subject: RE: FW: Your Position on a matter

My thoughts would be covered in the questions that Ronny added. From the attorney's remarks, it would seem that he is unaware of the overlap in events.

One additional question for the attorney; would Jeff have violated the fiduciary responsibility of his position as Director by removing that financial support of the organization and denying us use of the established logo when he stepped down, depriving the organization of our primary means of funding now that he was no longer Director?

The old, if I can't be the boss I'll take my money and go home tantrum....

Bill "Whirlwind" Richart
Missouri State Captain
Director of National Operations
Patriot Guard Riders

From: Ronny Awtry
Sent: Wednesday, October 03, 2007 12:44 PM
To: wescoot2; exec
Subject: RE: FW: Your Position on a matter

Ed,
My thoughts would be that we were told this a long time ago and that Jeff weaved a helluva web. That said, I would point out some very specific questions and not generalizations that may be pertinent and easier for the accountant, attorney to digest. It is very well known you want Jeff's head on a platter, no problems here with that. A better set of facts and questions would serve us all better.

Such as,

1. The logo for the PGR was designed and first used by the PGR on the PGR website. Jeff created it while an officer of the company. Is this a conflict of interest?
2. Jeff stated that the funds from the PGR store supported the PGR and expressed no delineation between the two. Is that legal? IRS Acceptable?
3. Jeff directly linked his store to the Navigation bar of the official website with no delineation. Is that legal? IRS acceptable?
4. Jeff advertised the PGR as a not-for profit the whole time to all parties who would listen. We gained our Oklahoma NFP status in 2-27-2006 through Tom Winters office. If he stated we were a NFP or 501c3 after that date was he illegal or violating IRS rules?
5. If the above happened while Jeff's store was specifically linked in the PGR, Inc. website navigation bar at that time giving appearance that the PGR store and the PGR were one in the same, was it unlawful and against IRS rules?

Serving You,

Ronny "BEAR" Awtry
Patriot Guard Riders
National Treasurer
Director - Help On The Home Front
www.patriotguard.org
bear@patriotguard.org

9/30/2008

PGR 003043

Confidentiality Notice: The information contained in this e-mail and any attachments may be legally privileged and confidential. If you are not an intended recipient, you are hereby notified that any dissemination, distribution, or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please notify the sender and permanently delete the e-mail and any attachments immediately. You should not retain, copy or use this e-mail or any attachment for any purpose, nor disclose all or any part of the contents to any other person. --

From: Ed Mueller [mailto:wescot2@yahoo.com]
Sent: Wednesday, October 03, 2007 11:58 AM
To: exec
Subject: Fwd: FW: Your Position on a matter

Hello everyone,

Here is a chain of e-mails between myself, our accountant, and lawyer. Sorry, but it will be necessary to read from the bottom up. I have read the opinion of our attorney, and personally feel he is not only way off base, but trying to cover for Jeff Brown. I'm not easy with his position, and would like your thoughts.

Respects,
Ed

Jon Tatum <jon@tatumassociates.cc> wrote:

From: "Jon Tatum" <jon@tatumassociates.cc>
To: "Ed Mueller" <wescot2@yahoo.com>
Subject: FW: Your Position on a matter
Date: Wed, 3 Oct 2007 11:38:22 -0500

Ed:

Good morning. Below, please find the opinion of the PGR, Inc's attorney concerning Jeff Brown selling products. If there are other questions you need clarified let me know.

Thanks,

Jon Tatum

From: Dan Belrute [mailto:dbelrute@wintersking.com]
Sent: Wednesday, October 03, 2007 11:19 AM
To: 'Jon Tatum'
Subject: RE: Your Position on a matter

Jon,

It is my understanding that Jeff's store existed before the non-profit corporation was formed and that the store sold PGR products before the non-profit was formed. Presuming that this is correct, the issue should be considered from two perspectives: (1) IRS rules, and (2) trademark law.

IRS rules prohibit a non-profit organization from funneling business to an officer or director of the organization. In this case, the non-profit should not have been used as a vehicle for attracting business and sales for Jeff's store. It is not clear to me that the non-profit was ever used for this purpose. The store sold PGR merchandise after the non-profit was formed, but this does not necessarily indicate that the non-profit was used to generate business or sales for the store. After all, there was apparently a market for the merchandise before the non-profit existed.

Trademark law provides that the originator of a name owns the name unless the owner conveys the rights to someone else or abandons use of the name. In this case, the non-profit did not originate the name. Presuming that Jeff originated the name or received rights in the name from the originator, he was the owner of the trademark rights. In such case, and unless the above IRS rules were violated, he was legally entitled as the trademark owner to sell PGR products.

9/30/2008

PGR 003044

I hope this helps. Please let me know if you have other questions.

Thanks,
Dan

From: Jon Tatum [mailto:jon@tatumassociates.cc]
Sent: Tuesday, October 02, 2007 10:35 AM
To: dbelrute@wintersking.com
Subject: FW: Your Position on a matter

Dan:

Call me and let's discuss this question regarding the Patriot Guard Riders, Inc.

Jon Tatum

Tatum & Associates, Inc.
2000 Mallory Ln, Ste 130-140
Franklin, TN 37067

Mail to: jon@tatumassociates.cc
(615) 300-1549 Voice
(615) 599-1560 Fax

From: Ed Mueller [mailto:wescot2@yahoo.com]
Sent: Monday, October 01, 2007 10:27 AM
To: Jon Tatum
Subject: RE: Your Position on a matter

Hi Jon,

Have you addressed this issue with our Attorney, and has he rendered an opinion?

Respects,
Ed

Jon Tatum <jon@tatumassociates.cc> wrote:

Ed:

I'll contact the attorney as you requested.

Jon Tatum

Tatum & Associates, Inc.
2000 Mallory Ln, Ste 130-140
Franklin, TN 37067

Mail to: jon@tatumassociates.cc
(615) 300-1549 Voice
(615) 599-1560 Fax

From: Ed Mueller [mailto:wescot2@yahoo.com]
Sent: Tuesday, September 25, 2007 8:28 PM
To: Jon Tatum
Subject: RE: Your Position on a matter

Hi Jon,

Yes I would like you to pursue this with our Attorney and clarify one additional point.

9/30/2008

PGR 003045

Since our 501c3 has been granted and goes back today one 21 Feb 06, did Jeff Brown break the law, not criminal, but IRS rulings, as he was running a for profit store as outlined in the other Attorney's case study of....

Church of Scientology v Commissioner case to be extremely similar to your situation (highlighted below). In this case, the founder of the Church of Scientology held copyrights to books he and others wrote. The funds from books sales were paid through a for-profit company to the founder. He advertised the books in writings and speeches about Scientology.

Members of the Church of Scientology purchased the books from the for-profit company. The court found the earnings from the book sales constituted self-dealing and stripped the Church of its exempt status and fined it for failure to file income tax returns. Based on current IRS regulations and case law on this issue, I would recommend that the organization keep its leadership separate from the PGR Store. Your organization should be sure all members are paying a fair price for goods purchased from the store. You may also wish to challenge the ownership of the trademarks used by the PGR Store since both organizations were tied together at the time the marks were registered.

Thank-you,
Ed

Jon Tatum <Jon@tatumassociates.cc> wrote:

Ed:

They may apply. The questions that would have to be cleared up here would be: Was the store part of the non-profit? Did the non-profit own the rights to the products being sold? Did Jeff's business sell product to the non-profit for resale? These are some questions that come to mind but there may be more. Your corporate attorney would have a better handle on this than I would most likely. I would be happy to contact Winter's King and ask about this on your behalf if you would like for me too.

Jon Tatum

Tatum & Associates, Inc.
2000 Mallory Ln, Ste 130-140
Franklin, TN 37067

Mall to: Jon@tatumassociates.cc
(615) 300-1549 Voice
(615) 599-1560 Fax

From: Ed Mueller [<mailto:wescot2@yahoo.com>]

Sent: Tuesday, September 25, 2007 11:41 AM

To: Jon Tatum

Subject: RE: Your Position on a matter

Hi Jon,

Thanks for the quick reply, and I understand your point about us being a 501c3, and the timing of that. My question is, since we were incorporated in the State of Oklahoma on 21 Feb 06, and Jeff Brown was running the store as a for profit business during the period of Feb 06 thru his departure of Nov 06, doesn't these same laws apply ??

Thanks,
Ed

9/30/2008

PGR 003046

Jon Tatum <Jon@tatumassociates.cc> wrote:

Ed:

Jeff's store had nothing to do with the non-profit corporation. The non-profit didn't even exist for most of the time that Jeff had the store. There may have been a short period that Jeff was selling product while the non-profit was in existence but I'm not sure what those dates would have been. He operated the store as a Sole Proprietor for tax purposes. I never prepared Jeff's tax returns so I can't say how that was handled. The attorney is correct with the assumptions below however the timing is what would hold up in court and with the IRS. Hope this helps.

Let me know if you have any other questions. I'm always glad to help.

Jon Tatum

Tatum & Associates, Inc.
2000 Mallory Ln, Ste 130-140
Franklin, TN 37067

Mail to: jon@tatumassociates.cc
(615) 300-1549 Voice
(615) 599-1560 Fax

From: Ed Mueller [<mailto:wescot2@yahoo.com>]
Sent: Tuesday, September 25, 2007 9:09 AM
To: Jon Tatum
Subject: Your Position on a matter

Hi Jon,

I have spoke to Ronny Awtry about how Jeff ran his store, and he assured me that both you, and our Attorney stated, that Jeff's way was preferable, and that the IRS would have no problem with it.

Below is a communication which I have received from another member, who sought the opinion of another lawyer (I have removed the lawyers name) Please read what she opines, and let me know your thoughts on this.

Letter follows

Patriot Guard Riders, Inc.

In Re: Non-Profit Self Dealing Rules

Dear Board of Directors:

I have been asked to provide your organization with my opinion concerning possible matters of self-dealing in your organization which could jeopardize PGR's tax exempt status with the IRS. I provide this opinion based on my past experience with nonprofit organizations and knowledge of the IRS rules and regulations concerning tax exempt entities.

I have been provided information about the Patriot Guard Riders, Inc. (PGR) and its connection to a for-profit entity, PGR Store, LLC (store). According to my information PGR was only permitted to obtain merchandise from the store. Members were linked to the store from the PGR web-site to purchase PGR gear, patches and supplies. It is my further understanding that the owner of the store was a board member of PGR. I understand that he has since been removed from that position.

The IRS does not tolerate self-dealing in nonprofit organizations. This premise is central to the tax-exempt statute which specifically states that "Corporations, and any community chest, fund, or foundation, organized and operated exclusively for religious, charitable . . . no part of the net earnings

9/30/2008

PGR 003047

of which inures to the benefit of any private shareholder or individual."26 USCS § 501. If an individual or group is reaping all the rewards of an organization then the IRS can and will take the organizations tax exempt status away.

I have enclosed a summary list of court rulings where the IRS has revoked an organization's 501(c)(3) status for self-dealing. I find the *Church of Scientology v Commissioner* case to be extremely similar to your situation (highlighted below). In this case, the founder of the Church of Scientology held copyrights to books he and others wrote. The funds from books sales were paid through a for-profit company to the founder. He advertised the books in writings and speeches about Scientology.

Members of the Church of Scientology purchased the books from the for-profit company. The court found the earnings from the book sales constituted self-dealing and stripped the Church of its exempt status and fined it for failure to file income tax returns.

Based on current IRS regulations and case law on this issue, I would recommend that the organization keep its leadership separate from the PGR Store. Your organization should be sure all members are paying a fair price for goods purchased from the store. You may also wish to challenge the ownership of the trademarks used by the PGR Store since both organizations were tied together at the time the marks were registered. Please feel free to contact me if you have any questions.

Sincerely,

Enclosure

U.S. Treasury Circular 230 Notice: Any tax advice contained in this communication (including any enclosures) was not intended or written to be used, and cannot be used, for the purpose of (a) avoiding penalties that may be imposed under the Internal Revenue Code or by any other applicable tax authority; or (b) promoting, marketing or recommending to another party any tax-related matter addressed herein. We provide this disclosure on written communication to assure compliance with new standards of professional practice, pursuant to which certain tax advice must satisfy extensive new requirements as to form and substance if it is to be used by the taxpayer as a defense to the attempt to impose penalties by the IRS.

SUMMARY OF SELF-DEALING CASES

When non-profit organization forms partnership with for-profit entity, non-profit should lose its tax-exempt status under 26 USCS § 501(c)(3) if it cedes control to for-profit entity. *St. David's Health Care Sys. v United States* (2003, CA5 Tex) 349 F3d 232, 2003-2 USTC P 50713, 92 AFTR 2d 6865. Payments by church to its founder support finding of inurement where founder used church to generate copyrighted literature and market his products, books were copyrighted in founder's name, publications copyrighted in founder's name were actually written by church employees, and church encouraged its staff members to aggressively market founder's products. *Church of Scientology v Comm'r* (1987, CA9) 823 F2d 1310, 87-2 USTC P 9446, 60 AFTR 2d 5386, 92 ALR Fed 231, cert den (1988) 486 US 1015, 100 L Ed 2d 214, 108 S.Ct 1752.

Fundraising organization's tax-exempt status is retroactively revoked where part of organization's income inured to benefit of insiders; however, embezzlement or conversion by insiders does not constitute inurement. *Variety Club Tent No. 6 Charities v Commissioner* (1997) TC Memo 1997-575, RIA TC Memo P 97575, 74 CCH TCM 1485.

Charitable corporation may operate business as substantial part of its

activities as long as it does so in furtherance of its charitable purpose; focus in deciding whether corporation qualifies for tax exempt status is on manner of operation of its business, not just whether it is organized under not for profit corporate statutes; corporation was not entitled to charitable purpose exemption although its stated purpose was to provide assistance to senior citizens, where proceeds from a second hand retail sales operations were diverted almost entirely to perpetuation of business, where less than half of its employees were over age of 55, their training was restricted to needs of business, corporation provided no housing facilities or health care, 10 percent or less of donated items were distributed directly to needy senior citizens, incomplete records were kept of such distributions, and corporation conducted no advertising to let senior citizens know of availability of such items. Senior Citizens Stores, Inc. v United States (1979, CA5 Tex) 602 F2d 711, 79-2 USTC P 9592, 44 AFTR 2d 5665.

Ed Mueller
National Director
Patriot Guard Riders Inc.
www.patriotguard.org

No virus found in this incoming message.
Checked by AVG Free Edition.
Version: 7.5.488 / Virus Database: 269.13.30/1029 - Release Date: 9/24/2007 7:09 PM

No virus found in this outgoing message.
Checked by AVG Free Edition.
Version: 7.5.488 / Virus Database: 269.13.30/1029 - Release Date: 9/24/2007 7:09 PM

Ed Mueller
National Director
Patriot Guard Riders Inc.
www.patriotguard.org

No virus found in this incoming message.
Checked by AVG Free Edition.
Version: 7.5.488 / Virus Database: 269.13.30/1029 - Release Date: 9/24/2007 7:09 PM

No virus found in this outgoing message.
Checked by AVG Free Edition.
Version: 7.5.488 / Virus Database: 269.13.30/1029 - Release Date: 9/24/2007 7:09 PM

Ed Mueller
National Director
Patriot Guard Riders Inc.
www.patriotguard.org

No virus found in this incoming message.
Checked by AVG Free Edition.
Version: 7.5.488 / Virus Database: 269.13.30/1029 - Release Date: 9/24/2007 7:09 PM

No virus found in this outgoing message.
Checked by AVG Free Edition.
Version: 7.5.488 / Virus Database: 269.13.30/1029 - Release Date: 9/24/2007 7:09 PM

Ed Mueller
National Director
Patriot Guard Riders Inc.
www.patriotguard.org

No virus found in this incoming message.
Checked by AVG Free Edition.
Version: 7.5.488 / Virus Database: 269.13.35/1041 - Release Date: 10/1/2007 10:20 AM

No virus found in this outgoing message.
Checked by AVG Free Edition.
Version: 7.5.488 / Virus Database: 269.13.39/1044 - Release Date: 10/2/2007 11:10 AM

No virus found in this incoming message.
Checked by AVG Free Edition.
Version: 7.5.488 / Virus Database: 269.13.39/1045 - Release Date: 10/2/2007 6:43 PM

No virus found in this outgoing message.
Checked by AVG Free Edition.
Version: 7.5.488 / Virus Database: 269.13.39/1045 - Release Date: 10/2/2007 6:43 PM

Ed Mueller
National Director
Patriot Guard Riders Inc.
www.patriotguard.org

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 9

Goswick, Diane

From: Jeff [jeffbrown@valornet.com]
Sent: Sunday, May 02, 2010 2:16 PM
To: Blue, Rachel
Subject: FW: Riding with Respect Logo

-----Original Message-----

From: Jeff Brown [mailto:jeffbrown@valornet.com]
Sent: Saturday, February 28, 2009 7:17 PM
To: rrawtry@yahoo.com
Subject: RE: Riding with Respect Logo

I'd be honored...go for it. Send pics when you can.
Thanks Bro,
Jeff

-----Original Message-----

From: ronny awtry [mailto:rrawtry@yahoo.com]
Sent: Saturday, February 28, 2009 7:12 PM
To: jeffbrown@valornet.com
Subject: Riding with Respect Logo

Dear Jeff Brown,

Greetings!! I am writing to you in hopes of securing usage to print large "Patriot Guard Riders- Riding With Respect" Vinyls for usage on my race car, "the Patriot Express" and on my toy hauler travel trailer which is my support vehicle for my race car. One graphic will be used on the entire roof as large as possible without cutting off any portion of the graphic, with 3 more approximately 4 Ft wide versions on the travel trailer sides and back. I will purchase any standard size graphics from the appropriate approved merchandiser as is currently PGR PX and/or Twisters Store and not duplicate these items. My total productions will be limited to the 4 graphics requested.

This is for this very specific usage and by no means will be sold, duplicated or delivered to any other person for any other reason, be it paid or not. I find that as I am now racing on motocross style race tracks I am fastly becoming a part of the next younger community of PGR Riders, and our organizations logo draws attention and questions every time it is seen in public at these races.

Thank you for your consideration. I'll do the logo justice in on track visibilty and good sportsmanship!! If acceptable, please forward me acknowledgement of your consent and a graphic of the logo that I can have enlarged to accomplish the stated request!!

Sincerely,
Ronny Awtry
Speedy Services
www.speedyairservices.com
972-299-5552

5/3/2010



Goswick, Diane

From: Jeff [jeffbrown@valornet.com]
Sent: Sunday, May 02, 2010 2:16 PM
To: Blue, Rachel
Subject: FW: questions

-----Original Message-----

From: Jeff Brown [mailto:jeffbrown@valornet.com]
Sent: Monday, December 22, 2008 10:33 AM
To: Dimples5166@aol.com
Subject: RE: questions

The mark included the name and the logo.

I have always stipulated that we continue to use the marks for the organization and its "non-commercial" applications. As the owner and creator of the marks, I want to control who and how they are used commercially. Since the BoD refused to take any further donations from me, that is one of the reasons I licensed the PGR-PX...we know exactly how much money comes in and how much should go to PGR and other veteran projects. Using the BoD figures for their store, by donating 25% of the gross proceeds, rather than "100% of the profits", the PGR-PX would provide a lot more money in donations. I hope that answers your question.

Have a very Merry Christmas!!
Jeff & Bonnie

-----Original Message-----

From: Dimples5166@aol.com [mailto:Dimples5166@aol.com]
Sent: Sunday, December 21, 2008 11:18 PM
To: jeffbrown@valornet.com
Subject: Re: questions

My question is what is a service mark. Is it the logo or something else? I am thinking this is al another scare tactic of the opposition I just want to be clear when I am asked questions.

One site keeps you connected to all your email: AOL Mail, Gmail, and Yahoo Mail. [Try it now.](#)

5/3/2010

IN THE UNITED STATES
PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

JEFF BROWN,

Opposer,

vs.

Opposition
No. 91181448

PATRIOT GUARD RIDERS, INC.,

Applicant.

The deposition of JASON DUANE WALLIN,
taken in the above-entitled cause, before
SUZANNE THALJI, Certified Shorthand Reporter of
the State of Illinois, on August 1, 2011, at
150 North Michigan Avenue, Suite 2700, Chicago,
Illinois, pursuant to notice, commencing at
1:58 p.m.

REPORTED BY: SUZANNE THALJI, CSR, RMR, CRR
LICENSE NO.: 084-002337
JOB NO.: 168210B

1 APPEARANCES:

2

McAFEE & TAFT, by
MS. JENNA PERRY
1717 South Boulder Avenue, Suite 900
Tulsa, Oklahoma 74119
(918) 587-0000
jenna.perry@mcafeetaft.com

6

Representing the Opposer;

7

CLARK HILL PLC, by
MR. JAMES A. O'MALLEY
MR. DAVID J. MARR
150 North Michigan Avenue, Suite 2700
Chicago, Illinois 60601
(312) 985-5900
(312) 985-5558
jomalley@clarkhill.com
dmarr@clarkhill.com

10

11

12

Representing the Applicant;

13

McCARTHY CALLAS CHURCH & FEENEY, PC, by
MR. JOHN S. CALLAS
329 18th Street, Suite 100
Rock Island, Illinois 61201
(309) 788-2800
jcallas@mcfe-law.com

14

15

16

Representing the Deponent.

17

ALSO PRESENT:

18

MR. WILLIAM HAROLD RICHART II

19

20

21

22

23

24

1	I N D E X		
2	WITNESS		
3	JASON DUANE WALLIN		
4	EXAMINED BY		PAGE
5	MR. O'MALLEY		5
6	MS. PERRY		66
7	APPLICANT'S EXHIBITS		
8	NUMBER	DESCRIPTION	PAGE
9	Exhibit 10	Emails dated 11/9/05, BROWN008012-13	9
10			
11	Exhibit 11	Emails dated 11/9/05, BROWN008010	14
12	Exhibit 12	11/10/05 email from Wallin to Brown, BROWN 010356	17
13			
14	Exhibit 13	Emails dated 11/10/05, BROWN008009	23
15	Exhibit 14	Trademark/Service Mark Application, Principal Register, Serial No. 77040379	25
16			
17	Exhibit 15	Emails dated 11/10/05, BROWN 010371	27
18			
19	Exhibit 16	11/11/05 email from Brown to Yunker, et al., PGR 006896-97	30
20	Exhibit 17	Cycle Connections printout, PGR 006920-27	39
21			
22	Exhibit 18	11/10/05 email from Olsen to Brown, BROWN 010354	45
23	Exhibit 19	Emails dated 11/11/05, PGR 002226-27	46
24			

1	APPLICANT'S EXHIBITS		
2	NUMBER	DESCRIPTION	PAGE
3	Exhibit 20	Emails dated 11/11/05, BROWN008007-08	49
4	Exhibit 21	11/12/06 email from Brown to Yunker, et al., PGR 002228	52
5	Exhibit 22	Emails dated 11/12/05 and 11/13/05, BROWN 010378-80	54
6	Exhibit 23	11/15/05 email from Brown to Calloway, et al., PGR 002231	56
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			

1 JASON DUANE WALLIN,
2 having been first duly sworn, was examined and
3 testified as follows:

4 DIRECT EXAMINATION

5 BY MR. O'MALLEY:

6 Q. Jason, I am Jim O'Malley. To my left
7 is Dave Marr. We represent Patriot Guard
8 Riders, Inc. in connection with this trademark
9 opposition that has been filed by Jeff Brown.
10 Have you ever had your deposition taken
11 before?

12 A. No.

13 Q. No, okay. So do you know how a
14 deposition works?

15 A. Understanding of this would be
16 basically that you would ask questions, I'm
17 under oath, and it's recorded. Is that a fair
18 statement?

19 Q. Sure. I will kind of give you a brief
20 reminder here. What is going to happen is I am
21 going to ask you a bunch of questions relating
22 to this trademark opposition and matters
23 pertaining thereto, and you will have to answer
24 them under oath. The other lawyer here, Jenna

1 Perry, represents Jeff Brown, and she will also
2 be allowed to ask you questions too at the end
3 of our back and forth if she so chooses. The
4 court reporter is taking everything down, will
5 prepare a written record of everything that's
6 said, which is referred to as a transcript. If
7 you want to, you can review the transcript to
8 check if it's accurate, make any corrections
9 before signing it. Do you understand all of
10 that?

11 A. Um-hum.

12 MS. PERRY: Yes?

13 MR. O'MALLEY: I'm sorry.

14 A. Yes, yes.

15 Q. I haven't gotten to that point yet. It
16 is very important that you understand the
17 questions and give accurate answers. If there's
18 anything that you don't understand or anything
19 that you don't know or aren't sure of, let us
20 know, okay?

21 A. Okay.

22 Q. Getting to that now, please be sure to
23 verbalize your answers to make it easier for the
24 court reporter. So don't nod or shrug --

1 A. Okay.

2 Q. -- or anything like that.

3 Are you feeling good this afternoon?

4 A. Yes.

5 Q. Are you under any kind of medications
6 that would impact your ability to get through
7 this deposition?

8 A. No.

9 Q. No? Okay. Let's get started here.
10 First exhibit I am going to introduce is
11 Applicant's Exhibit number -- actually, I
12 apologize. Let me back up a little. Can you
13 state your full name for the record?

14 A. Jason Duane, D-u-a-n-e, Wallin,
15 W-a-l-l-i-n.

16 Q. Okay. And what is your address?

17 A. 848 17th Street, Moline.

18 Q. Moline?

19 A. 61265.

20 Q. Okay. And where do you work?

21 A. I work for a Fortune 500 company in IT,
22 John Deere specifically.

23 Q. Okay. And what is your educational
24 background?

1 A. I have an associate's degree and some
2 post-associate's degree work but just a little
3 bit.

4 Q. Okay. And were you in the military?

5 A. Yes, I was.

6 Q. Can you provide me with some of your
7 information about your military career?

8 A. During my time in the military, it was
9 from -- I'm going to have to think about this
10 here for a second. Regular Army is where I was
11 in there. Left for basic training it would have
12 been February of -- I want to say '95, something
13 like that.

14 Q. Okay.

15 A. And then -- it might have -- actually,
16 '96, I'm sorry, and then carried through till
17 '98, and after getting out of the military
18 there, I was E3, private first class.

19 Q. Okay. I apologize. I don't know
20 the --

21 A. Specializing in information technology
22 and communications for the military there.

23 Q. Okay. And then so when did you end
24 your military career?

1 A. '98.

2 MR. O'MALLEY: '98, okay. Let's introduce
3 this exhibit. This is going to be Applicant's
4 Exhibit No. 10. Just so you know, we've had
5 prior exhibits already.

6 (Applicant's Exhibit 10 was
7 marked for identification.)

8 BY MR. O'MALLEY:

9 Q. This is Applicant's Exhibit No. 10,
10 which was produced by Jeff Brown, Bates number
11 BROWN008012 to BROWN008013. In the middle of
12 this page is an email from Jeff Brown,
13 jeffbrown@valornet.com, to somebody by the name
14 of Husky and to somebody named Wallin, Jason D.
15 That's you?

16 A. That's me, yes.

17 Q. And this was sent on Wednesday,
18 November 9, 2005, "Subject: PGR." Do you
19 recall this email?

20 A. It was very typical to one of the ones
21 that we had there. This precise one I didn't
22 recall, but in the early days it was just a
23 matter of sending out emails when we knew that
24 somebody was going to be protesting and who was

1 closest to it, and if anybody was in the area,
2 if we can do anything.

3 Q. Okay. Prior to this date had you ever
4 been in contact with Jeff Brown?

5 A. No.

6 Q. So this was your introduction to him
7 basically, him sending you an email?

8 A. Correct, yeah. I think if we look --
9 I'm trying to figure out the chronology here.
10 It looks like, yeah, this probably would have
11 been the first one, yes.

12 Q. And so in here he says "Hey Guys,"
13 referring to you and to somebody named Husky,
14 saying, "Preacher just sent me your email
15 address to put you on the PGR notification list.
16 Either of you near Beatrice, Nebraska? Let me
17 know and I'll send you details." Then he says
18 "Welcome aboard...a couple of things. If you
19 know other riders that want to get involved,
20 regardless of any organization, let me know and
21 I'll put them on the list. Send me any
22 information you want distributed. Thanks, Jeff
23 Brown 'Twister.'"

24 And now you sent what appears to be a

1 response to him there, right?

2 A. Right.

3 Q. Can you read off what you responded?

4 A. "I live just outside of Greeley and
5 will be there on Friday with 7 confirmed biker
6 patriots we will be trying to meet up about
7 11:20 and roll in mass. I am currently working
8 with the hog chapters in the area and some of
9 the motorcycle social clubs. His funeral is
10 listed the whole schedule but not on the main
11 page.

12 "As I know more tomorrow, I will update
13 you."

14 Q. And then your signature?

15 A. Right.

16 Q. Tell me more about this funeral that
17 you were going to.

18 A. That would have been -- at that time
19 frame would have been Tyler MacKenzie which was
20 just several miles from my house there, and we
21 got together with some of the other people I
22 knew, bikers that I had worked with and then
23 some of the other organizations just to try to
24 get a response put together there.

1 Q. Sure, okay. Now, did Jeff Brown tell
2 you about this funeral that was going on, or was
3 this something that you were aware of on your
4 own?

5 A. I believe that it was something that we
6 found out through local media, that it was there
7 in addition to it being on the Westboro site.

8 Q. Okay. Sounds good. Okay. In
9 connection with this -- let me back up here. At
10 the bottom of this space here, there's kind of
11 like some what look like equal signs, and it
12 says "Here's what's listed" -- this is as a part
13 of the email from Jeff Brown to you and to
14 Husky. It says, "Here's what's listed, in case
15 you've not checked their site recently. If you
16 know riders in these areas, regardless of any
17 group affiliation, pass it along and encourage
18 them to join in a Patriot Guard Ride to to,"
19 double tos, "honor our fallen heroes and support
20 their families. If anyone has contact
21 information for rides in these areas, please
22 pass it along to me and I will see it gets out.
23 Thanks, Jeff Brown 'Twister,' Broken Arrow, OK."
24 Did you know what he was referring to

1 when he said "Patriot Guard Ride" at the time?

2 A. Basically the assumption was made and
3 this would have been -- you know, after seeing
4 it on the Internet with the folks directly in
5 Kansas there, the American Legion riders that
6 would go because initially the Westboro Baptist
7 folks would stay in pretty close proximity to
8 where they were at from Topeka there. I
9 think -- and I can't say this for sure, but my
10 belief is that, you know, as they became more
11 effective at blocking them out, that they kind
12 of had expanded the horizon to which they were
13 willing to travel to go to protest at some of
14 these funerals.

15 Q. Okay. So this group from Kansas, what
16 did you refer to them as?

17 A. The Patriot Guard was their initial
18 name that they had used there, but they were the
19 American Legion riders from Topeka, and I
20 believe there were some other folks from the
21 Salina area as well.

22 Q. Now, had you heard that name Patriot
23 Guard before you came to know Jeff Brown --

24 A. Yes.

1 Q. -- or after?

2 A. Before.

3 (Applicant's Exhibit 11 was
4 marked for identification.)

5 BY MR. O'MALLEY:

6 Q. Before, okay. Thank you. This exhibit
7 is Applicant's Exhibit No. 11, which was
8 produced by Jeff Brown and is identified as
9 BROWN008010. This email, the bottom part of
10 it -- feel free to check if you like, but I will
11 put forward that it's identical to the bottom
12 part of the email that was in Exhibit 10, but
13 there is a new response from you that you have
14 replied to that email again. Can you tell me
15 what your second response is here?

16 A. Basically that the domain name was
17 available. We had bought it, and I was offering
18 to host it for Jeff or host it for the
19 organization, which focal point was shifting to
20 Jeff at that time.

21 Q. Okay. And what was the domain name?

22 A. Patriotguard.org.

23 Q. Okay. Why did you -- let me first back
24 that up. Did Jeff ask you to purchase this

1 domain name?

2 A. No.

3 Q. Did you tell him you were going to do
4 that prior to doing it?

5 A. I think we just did it because we
6 needed a better way than just email to
7 communicate.

8 Q. Okay. Is there a reason -- sorry,
9 strike that.

10 Why was the domain patriotguard.org the
11 domain that was purchased?

12 A. The org part was for the organization
13 and Patriot Guard being the shortest name
14 available. That was it so --

15 Q. Okay. Sounds good. And so you offered
16 to host this domain name. What do you mean by
17 you can host it?

18 A. Put up a website and use that to convey
19 some information out there about where we were
20 needed.

21 Q. Okay. So you were proficient in --

22 A. Yes.

23 Q. -- building websites, creating websites
24 so others could view and use it?

1 A. Yes.

2 Q. Okay. And so the date on this, when
3 did you send your email?

4 A. Looks like also November 9, which would
5 be the same as the other exhibit.

6 Q. Okay. Thank you. Actually, can we
7 back up? I'm sorry. I forgot to mention one
8 thing here. In your statement it says "Btw,"
9 which I assume means by the way --

10 A. Correct.

11 Q. -- "you now own patriotguard.org domain
12 name."

13 A. Right.

14 Q. What did you mean when you said you now
15 own this?

16 A. It was basically as the national
17 coordinator, we provided that name there. It
18 wasn't that I was buying it personally for Jeff.

19 Q. Okay. So you were buying it for the
20 organization?

21 MS. PERRY: Objection. That's leading.
22 Please rephrase.

23 BY MR. O'MALLEY:

24 Q. So who were you buying this for then?

1 A. For the organization.

2 (Applicant's Exhibit 12 was
3 marked for identification.)

4 BY MR. O'MALLEY:

5 Q. Okay. Thank you. This is Applicant's
6 Exhibit No. 12, which was produced by Jeff Brown
7 and identified as BROWN010356. Do you recognize
8 this document?

9 A. Yes. It looks like an email that I had
10 sent there, basically the setup for Pfc Ryan
11 Tyler MacKenzie's funeral there in Greeley.

12 Q. And what was the date of this email?

13 A. It would have been 10th of November.

14 Q. And who were you sending this to?

15 A. It looks like just directly to Jeff
16 Brown.

17 Q. And so in there you say everyone. Does
18 that mean -- in the "To" line it shows Jeff
19 Brown. Was this --

20 A. At this point I believe communication
21 was being done via an email list that Jeff was
22 compiling and maintaining at this point and I
23 would -- you know, six years on here, I would
24 believe that I had sent this to him to

1 redistribute to that list.

2 Q. Okay. In there you said, "I have
3 notified the Greeley PD," police department?

4 A. Correct.

5 Q. "That we will be there and they have
6 indicated that they have spaces designated for
7 both of us tomorrow."

8 Can you kind of go through what you did
9 in connection with your contacting of the
10 Greeley Police Department?

11 A. Well, let me back one step up from that
12 there. We had contacted the funeral home where
13 the visitation was for Tyler there and, you
14 know, reached out and said, hey, can you ask the
15 family -- we know that the Westboro folks have
16 said they are going to be there. Can we also --
17 you know, would it be okay if we were there and,
18 if so, we'll make the arrangements and take care
19 of that.

20 On the 11th -- or on the 10th, I should
21 say, we received a call back from the funeral
22 director saying that he had talked to the family
23 and that would be okay. So at that point then I
24 had contacted the police department to let them

1 know that we would be there too and kind of
2 serve as a shield in between the Westboro
3 Baptist folks and the mourners that were coming
4 to the services there.

5 Q. Okay. Why did you contact the funeral
6 home first?

7 A. To get the family's okay because I mean
8 we didn't want to inject ourselves in one of the
9 worst days in their family's lives if they
10 didn't want us there.

11 Q. Okay. Now, did you have talks with
12 Jeff about contacting the funeral home or
13 contacting the police department before you did
14 this -- before you did that, I apologize, before
15 you contacted them?

16 MS. PERRY: Can you restate the question,
17 please?

18 MR. O'MALLEY: Sure.

19 Q. Did you have contact -- not contact.
20 Did you have any communications with Jeff Brown
21 about telling him that you were going to contact
22 the funeral home or the police department?

23 A. Yes, in the sense in -- you are going
24 to have to forgive me here with six years

1 separation. My belief was that at this time if
2 it wasn't happening already, it was rapidly
3 evolving to the point that, you know, that was
4 how we would operate with, you know, trying to
5 get a hold of the families first to do that and
6 from that.

7 I can't give you the exact details of
8 that conversation or even for that matter if
9 that conversation took place, but I believe that
10 it well could have here. I can't say with
11 definitiveness that it did so --

12 Q. Okay. Under your signature, I guess I
13 would say your name, there is what I guess is
14 kind of commonly called a signature line?

15 A. Yes.

16 Q. And it says, "The Patriot Guard is made
17 up of all Patriotic Riders...including Clubs,
18 Associations and individuals... our Mission is
19 Honor the Soldier / support the Family and
20 Shield the Family from the idiots..."

21 Did you write that up or was -- did
22 that come from somewhere? Where is the
23 origination of that statement?

24 A. I can't honestly tell you where that

1 came from. I mean I think in the traffic back
2 and forth between everybody that the group had
3 come up with, it probably came up with that, or
4 it was something that Jeff could have created or
5 something that we all kind of put a little piece
6 of that together. I can't honestly tell you.

7 Q. Okay. So at this time you used the
8 term everyone, and from what I understand you
9 stated that there was kind of a list out there
10 that Jeff was compiling?

11 A. Right.

12 Q. Who were the people that were on this
13 list; do you know?

14 A. Basically everybody who had heard kind
15 of what we were doing and they were wanting
16 somebody to get ahold of, that central contact
17 point was Jeff.

18 Q. And how would they have heard what you
19 were doing?

20 A. Through the different biker forums and
21 some of the news around the Internet there.

22 Q. Okay. And so would you consider --
23 sorry. I am trying to find the right wording
24 here. At this time there were other people that

1 were on this list?

2 A. Correct.

3 Q. And you were all working together?

4 A. Yes.

5 MS. PERRY: Objection, that's leading.

6 BY MR. O'MALLEY:

7 Q. What were you all working to do?

8 A. Well, it was to set up that -- set up
9 the ability to no matter where they were at have
10 somebody that we could get in contact with. So
11 in essence it was working together to set up
12 that safety net around the country if we could.

13 Q. Okay. And so what was it that all of
14 these people would ultimately do? What was
15 their purpose?

16 A. The purpose would be to put rides
17 together just as we had done here in Greeley at
18 the other locations where the Westboro Baptist
19 folks were at the beginning.

20 Q. And who were you doing that for?

21 A. The families.

22 Q. The families?

23 A. Yes.

24

1 (Applicant's Exhibit 13 was
2 marked for identification.)

3 BY MR. O'MALLEY:

4 Q. Okay. Thank you. This document is
5 Applicant's Exhibit No. 13, produced by Jeff
6 Brown and identified as BROWN008009. In the
7 middle part of this page, there is an email from
8 Jeff Brown dated Thursday, November 10, 2005,
9 and he is sending this email to a number of
10 people, one of whom is your name, Wallin, Jason
11 D., the third line down?

12 A. Correct.

13 Q. And the subject is "PGR Logo."

14 A. Yes.

15 Q. Can you read that email for me?

16 A. "Several people have asked about a
17 Patriot Guard Riders patches, decals, arm bands,
18 flags, etc. I like the idea and believe it will
19 enhance our presence at any service without
20 taking anything from the other organizations you
21 may belong to. I have designed a logo that I
22 think works very well for us. I am working with
23 a company to produce the stuff and will send out
24 more information as it becomes available. Also,

1 Jason Wallin from Colorado has graciously
2 donated web hosting for us and I hope to have a
3 website up soon. The domain name reserved is:
4 patriotguard.org. I've attached the logo."

5 Q. Okay. Here he refers to Patriot Guard
6 Riders patches, decals, arm bands, flags. Prior
7 to this email, and feel free to look back at the
8 exhibits I have introduced before, have you seen
9 reference to Patriot Guard Riders specifically?

10 A. The closest thing that I think I had
11 seen at this point was the signature block in
12 Exhibit 12 there, which I don't believe directly
13 says Patriot Guard Riders, but it says Patriot
14 Guards, then referring to patriotic riders.

15 Q. Okay. And now Jeff says, "I like the
16 idea and believe it will enhance our presence at
17 any service."

18 In your opinion who is he referring to
19 when he says our presence?

20 A. I would have to believe that to be the
21 Patriot Guard or Patriot Guard Riders.

22 Q. Okay. He says he has designed a logo
23 that I think works very well for us and then
24 down at the bottom says, "I've attached the

1 logo."

2 A. Correct.

3 Q. Now, this logo was not produced by him,
4 but do you know what that logo is?

5 A. That was the one that the trademark
6 application was filed against. It was the
7 triangle with the American -- folded American
8 flag in there.

9 MR. O'MALLEY: Okay. Let me get that here.

10 (Applicant's Exhibit 14 was
11 marked for identification.)

12 BY MR. O'MALLEY:

13 Q. Okay. This is Applicant's Exhibit
14 No. 14, which is a trademark application
15 recently printed off of the United States Patent
16 and Trademark Office's website for a mark having
17 the literal element identified as "Patriot Guard
18 Riders Riding with Respect." That's showing on
19 the first page. Can you turn to the second to
20 last page in this document, where there is a
21 color logo. Is this the logo --

22 A. That is the logo that Jeff is referring
23 to.

24 Q. -- that is being referenced here?

1 A. Yes.

2 Q. Okay. Thank you. We can put this one
3 away for a little bit here.

4 Okay. And at this time -- sorry. Back
5 up. So then in response to this email, you send
6 an email back to Jeff Brown it appears later
7 that day on November 10 where you say, "FYI I
8 threw up a placeholder @ www.patriotguard.org."
9 What is a placeholder?

10 A. Basically, what you would see when a
11 website is under construction, you know, where
12 it has a logo and says coming soon or something
13 along those lines there with -- to the best of
14 my recollection, that placeholder consisted of
15 this logo, and it said Patriot Guard Riders site
16 coming soon.

17 Q. So the logo that Jeff Brown attached to
18 his email --

19 A. Correct.

20 Q. -- was on there?

21 Going about putting that up there, why
22 did you put that logo up on the website?

23 A. Because I thought that was the working
24 logo that we were using as the organization at

1 that point.

2 MR. O'MALLEY: Okay. Thank you. Can we take
3 a five-minute break if that's okay.

4 (Recess taken.)

5 BY MR. O'MALLEY:

6 Q. Back on the record, please. Staying
7 with Applicant's Exhibit No. 13, at the top you
8 say, "FYI I threw up a placeholder at
9 www.patriotguard.org." Were you instructed to
10 do that?

11 A. No.

12 Q. Did anybody tell you to do that?

13 A. No.

14 Q. So you did it on your own?

15 A. Yeah. I was just so excited as I
16 recall, having a logo or some graphic to put up
17 there on that website. I just right click saved
18 it and put it out on the website.

19 (Applicant's Exhibit 15 was
20 marked for identification.)

21 BY MR. O'MALLEY:

22 Q. Okay. Thanks very much. This is
23 Applicant's Exhibit No. 15, produced by Jeff
24 Brown, identified as BROWN010371. In this

1 document there are two emails. First kind of in
2 the middle is an email from Jeff Brown to you
3 dated Thursday, November 10, 2005. In there he
4 says, "Jason, If you get a few minutes after you
5 return from the ride, I'd sure appreciate a
6 brief report that we can post on the website."

7 Is there a reason why he's asking for
8 this information?

9 MS. PERRY: Objection. That's speculation.

10 MR. O'MALLEY: You can answer.

11 MS. PERRY: You can answer.

12 MR. O'MALLEY: You can answer.

13 THE WITNESS: Okay.

14 MS. PERRY: We are both going to do that.

15 A. Okay. Well, no, like I say, I had
16 never done a deposition before so -- I would
17 imagine it would be to share the experience one
18 has with the group at large so --

19 BY MR. O'MALLEY:

20 Q. Okay. Was Jeff Brown going to be at
21 this ride?

22 A. No.

23 Q. No, okay. And then in response to this
24 email, there is a response from you to Jeff

1 Brown dated November 10, 2005, a little later in
2 the evening, where you say, "Sure that would be
3 great. The other thing that would be helpful I
4 think would be a faq or how to organize one of
5 these that I planned to type up afterwards."

6 And then you say: I had a chance to
7 talk to the funeral director and it sounds like
8 their intent is to use the wonderful sound of
9 drag pipes to silence the protestors. They have
10 us parking with the pipes facing them.

11 Just for my knowledge, what are drag
12 pipes?

13 A. The things that make Harleys sound like
14 Harleys.

15 Q. So, in other words, if you were to have
16 a speaker, you would be facing the front of the
17 speaker, the sound coming out directed at them?

18 A. That would be correct, yes.

19 Q. Fair analogy, okay. So basically in
20 essence by saying "Sure that would be great,"
21 you agreed to provide what Jeff was asking for?

22 A. Yes.

23 Q. Okay. And then you also were
24 suggesting some other things that would be

1 helpful. What did you mean by an FAQ?

2 A. Basically, a frequently asked question
3 because, you know, as this was new and it was
4 starting to take off there, none of us had a
5 clue as to what we were doing. I mean, you
6 know, if we found something that worked, we
7 could kind of share that information amongst
8 ourselves there and kind of -- you know, what's
9 common amongst all of the different rides.

10 (Applicant's Exhibit 16 was
11 marked for identification.)

12 BY MR. O'MALLEY:

13 Q. Okay. Sounds good. This is
14 Applicant's Exhibit No. 16 which was produced by
15 PGR and identified as PGR 006896 to PGR 006897.
16 This is an email from Jeff Brown dated Friday,
17 November 11, 2005, at 5:18 p.m., which is sent
18 to a number of people and some associations in
19 there, but also your name is in there, correct,
20 as one of the recipients?

21 A. Yes.

22 Q. Okay. Can you take a look at this
23 email and tell me what it is, what's happening?

24 A. Basically, I think this is one of our

1 very early ride reports in which we kind of, you
2 know -- as was mentioned in whatever this other
3 number here was, 15, that it's a brief report
4 that we can post on that website there and then,
5 you know, I think -- you know, I think that was
6 the intent with it, was kind of a breakdown of
7 how everything went and whether or not the
8 Westboro folks were there.

9 Q. Okay. So my reading of it, kind of an
10 obituary --

11 A. Correct.

12 Q. -- for Tyler MacKenzie?

13 A. Right.

14 Q. But then on the last sentence here,
15 there is a statement that says, "Jason Wallin,
16 our Colorado State Captain, headed up our
17 presence there and post these photos and will
18 post a write up later," and then there's a
19 website listed and it says "WBC (World's Biggest
20 Cretins) were there.

21 "Thanks to Jason and all who rode."

22 And then there's "Jeff Brown 'Twister,'
23 Broken Arrow, OK, Patriot Guard Rider,
24 www.patriotguard.org."

1 A. Yes.

2 Q. When he's talking here, it says "our
3 Colorado State Captain." What is Jeff referring
4 to, if you know?

5 A. My expectation is that that was the
6 state captain for the Patriot Guard Riders
7 organization.

8 Q. Okay. And then the same where he says
9 "headed up our presence there"?

10 A. Yes.

11 Q. That applies to the Patriot Guard
12 organization as well?

13 A. Yes.

14 Q. And then he says "Thanks to Jason and
15 all who rode." Was Jeff Brown there?

16 A. No, he was not.

17 Q. He was not, okay. Going back to
18 Exhibit 15 where -- let me make sure I have my
19 numbers correct. Okay. So in Exhibit 15 Jeff
20 Brown had sent you a request saying "after you
21 return from the ride, I'd sure appreciate a
22 brief report that we can post on the website."
23 Did you provide information to Brown pursuant to
24 his request in Exhibit 15 that he is then using

1 to send out the email in Exhibit 16?

2 MS. PERRY: Can you rephrase that question?

3 MR. O'MALLEY: I'll try.

4 MS. PERRY: I am not sure I understand it.

5 MR. O'MALLEY: It got a bit long here.

6 Q. So in Exhibit 15 Jeff Brown says,
7 "Jason, If you get a few minutes after you
8 return from the ride, I'd sure appreciate a
9 brief report that we can post on the website."

10 A. Yes.

11 Q. Did you ever provide such a report to
12 Jeff, if you recall?

13 A. To the best of my knowledge, I can't
14 fully recall that I did put one together, but if
15 we take a look at the list of who was sent out
16 there, there are several of the riders who were
17 with us there that day which was myself, Hugh
18 Knaus. Let me see if anybody else was in that
19 list. I believe that's it to the best of my
20 knowledge. But with that said, I think -- I
21 don't know. I mean there really could have been
22 two sources for this one being -- I had
23 submitted it there where some of it could be
24 posted from the obituary as well, but the

1 obituary certainly wouldn't have had that I was
2 there or that the Westboro Baptist folks were
3 there.

4 Q. Okay. Sticking with Exhibit 16, he
5 says here that, "Jason Wallin, our Colorado
6 State Captain, headed up our presence there and
7 post these photos and will post a write up
8 later," and then there is a website which is
9 www.wallininc.com/pix, and it goes on?

10 A. Right.

11 Q. How was Jeff aware of this website and
12 that there were photos?

13 A. I would have had to have shared it with
14 him.

15 Q. Okay.

16 A. It's not something that would have just
17 been publicly exposed out there.

18 Q. Okay. Speaking of the funeral that you
19 attended for -- is it private first class --

20 A. Yes.

21 Q. -- Tyler MacKenzie?

22 A. Correct.

23 Q. Can you tell me a little bit about that
24 ride, like what happened, what you did in

1 preparation for it?

2 A. There were about 30 of us that had
3 gotten together for that, you know. It was
4 several of the people who we knew from the hog
5 owner group as well as some folks that I had
6 worked with and just some family friends and
7 stuff that we had known.

8 Basically, what we had done is we had
9 taken the, you know, group, got together and
10 rode in basically, you know, several different
11 smaller groups into staging at the funeral
12 there. In addition to that, you know, we had
13 had printed out some copies of the logo since it
14 had just come out a couple days before that and
15 put those in the windshield of the bikes that
16 did have those as well.

17 Q. How did you put them in?

18 A. With Scotch tape.

19 Q. Scotch tape, okay. Did that work well?

20 A. No.

21 Q. No?

22 A. But --

23 Q. Okay. When you arrived at the funeral,
24 did you still have logos?

1 A. Well, we had some more in the saddle
2 bag and then we retaped what --

3 Q. Retaped?

4 A. Yes.

5 Q. Okay. So these were then taped only to
6 your bikes?

7 A. Correct.

8 Q. Not on somebody's clothes --

9 MS. PERRY: Objection. That is leading.

10 BY MR. O'MALLEY:

11 Q. Okay. How did you get from wherever
12 you started from to the funeral?

13 A. Okay. Like on the road you mean or --

14 Q. Yes. Were there certain roads that
15 were taken?

16 A. Well, we had a contingent coming on the
17 interstate, and then we took U.S. 34 in to
18 Greeley, the business -- 34 to -- I don't know
19 what the exact cross street is. I think I've
20 got it in one of these other exhibits and then
21 surface streets inside of Greeley there to 49th
22 Avenue.

23 Q. At the funeral, when you are at the
24 funeral now and your group is at the funeral,

1 what went on there?

2 A. Basically, you know, early Patriot
3 Guard Rider activity was we'd fire up the bikes
4 and make them so we were louder than the
5 Westboro folks so the family didn't have to see
6 that on that day.

7 Q. Did you have involvement with the
8 family or communications with the family?

9 A. Through the funeral director for this
10 first one but generally as we became more
11 refined with it, it was directly with the family
12 in most cases.

13 Q. What about with any individuals from
14 the WBC?

15 A. No, no communication at all.

16 Q. Who all were in attendance at that
17 funeral, if you know?

18 A. From the Patriot Guard side or from the
19 WBC side?

20 Q. Wherever.

21 A. Okay. Well, the Westboro Baptist folks
22 were there. Conjecture, ten, eight of them,
23 something like that, but basically what could
24 fit in a large van because they had a large van

1 they came in to town with and then --

2 MS. PERRY: Can I get a clarification here?

3 Are you speaking of just this first one?

4 THE WITNESS: That's what I am speaking of
5 now.

6 MR. O'MALLEY: Yes, yes, yes.

7 MS. PERRY: Okay.

8 A. And then, you know, I don't remember,
9 but I think it was somewhere between 20 and 30
10 bikes that the Patriot Guards had there as well,
11 you know, kind of set up in between them in the
12 parking lot there of the church, and then the
13 mourners and family in attendance as well as the
14 military honor guard was there as well so --

15 BY MR. O'MALLEY:

16 Q. Okay. Was there any media there?

17 A. Yes. They did have the local Fox
18 affiliate was there as well.

19 Q. Did anybody from your group have
20 communications with the media?

21 A. I didn't directly, and I don't know if
22 anybody did or did not, but I'm sure they got
23 shots of the bikes up and down as they were
24 filing their news story there.

1 Q. Okay. Was anybody who was in
2 attendance at the funeral other than your group,
3 did anybody talk to you or to others that you're
4 aware of asking who you were, what you were
5 doing?

6 A. I think we had had some people come up,
7 and we kind of indicated that, you know, hey,
8 we're the Patriot Guard, to make sure that the
9 idiots across the way couldn't ruin that day
10 for -- or make that day any worse for the family
11 than it already was.

12 Q. Was the family appreciative of --

13 A. They had said so.

14 Q. -- your efforts?

15 A. Yes.

16 MR. O'MALLEY: Okay. Let's skip to the next
17 one. Are we on 17? I just want to make sure.

18 MR. CALLAS: Seventeen.

19 (Applicant's Exhibit 17 was
20 marked for identification.)

21 BY MR. O'MALLEY:

22 Q. Okay. This is Applicant's Exhibit
23 No. 17 which was produced by PGR and identified
24 as PGR 006920 to PGR 006927. This is -- I

1 apologize. Are you familiar with this document?

2 Have you seen it before?

3 A. Yeah. I think it's one of the early
4 Cycle Connections magazine articles they had
5 done with us here.

6 Q. What is Cycle Connections?

7 A. A motorcycle magazine and then they had
8 an online presence as well.

9 Q. Okay. And this is their website,
10 www.cycleconnections.com?

11 A. Yes.

12 Q. Okay. Do you subscribe to this?

13 A. No, I don't currently.

14 Q. Did you -- I was about to say at the
15 time, but we haven't discussed when it is. So
16 let's back up.

17 A. Okay.

18 Q. So on the front here, the first page,
19 there is kind of a header that says "Veteran
20 Riders," correct?

21 A. Yes.

22 Q. And then on the next page there is -- I
23 don't know if it is a subheading that says
24 "Patriot Guard Riders." If we can flip kind of

1 to the back, go to what is PGR 006925 and again
2 kind of midway down it says "Printer Friendly
3 Version," and it says "Veteran Riders," and then
4 it appears to have a number of dates listed
5 below those with some kind of a title or heading
6 associated with them.

7 A. Right.

8 Q. Going to the next page, PGR 006926, if
9 you go about midway down, there is one that says
10 "1/1/2006," and it says "Patriot Guard Riders"
11 next to it. Is that correct?

12 A. Okay. Yes.

13 Q. Does that mean anything to you?

14 A. Well, if you look, it's got the same
15 title as on page 2 there. I don't -- can't
16 confirm that as a matter of fact, but that would
17 be what I would speculate.

18 Q. Sure. Okay. Let's go to PGR 006922.
19 Okay. Third paragraph down here -- let me start
20 with this. Do you know -- did Jeff give a lot
21 of interviews?

22 A. We all did in the early days, so, yes,
23 we did.

24 Q. Okay. So it's not uncommon for him to

1 give interviews?

2 A. Correct.

3 Q. If you can go to the third paragraph,
4 it says "I sincerely request"?

5 A. Yes.

6 Q. Can you read that paragraph and then
7 the next line after that?

8 A. Okay. "I sincerely request that each
9 and every one of my readers visit
10 www.patriotguard.org and if it is in your heart,
11 join this fine group. If you cannot join but
12 agree with their mission, please pass their
13 message on to others. I want to thank Jeff
14 'Twister' Brown, National Director of the
15 Patriot Guard Riders, for his time and for
16 sharing information with me for this article.

17 "Jeff also took time out of his busy
18 schedule for the following interview."

19 Q. Okay. So who in your opinion is giving
20 these responses?

21 A. Jeff Brown.

22 Q. Okay. Can we fast forward two pages to
23 PGR 006924?

24 A. Okay.

1 Q. It appears that -- I am guessing the
2 interviewer who is going by CC. Can you read
3 the first thing where it says, "Tell us about
4 your first mission?"

5 A. Okay. "You talk about dramatic! There
6 are pictures of it on our website. I believe it
7 was in Greeley, Colorado, and in fact a local TV
8 station did an interview, and we hadn't been in
9 existence but maybe two days and this one rider
10 rode up there and parked his bike in front of
11 the protesters and I'll tell you what, I'll give
12 him credit, he literally sat there very
13 stoically and make his presence known."

14 Q. When you read this statement by Jeff,
15 is there anything wrong with it, off with it?

16 A. I think we got a couple of these
17 swapped around because as we were getting
18 started, they were fast and furious. I mean I
19 can't speak exactly to that. I can guarantee
20 you the one in Greeley had more than a single
21 rider with it there. I know at the same time, I
22 believe the same date, as a matter of fact, that
23 David Olsen had one up either in Minnesota or
24 Wisconsin. He lived right on the border up

1 there and went by the screen name Ole there and
2 he actually -- they did have video of him as
3 well on the local news that was posted and made
4 available online.

5 Q. Now, he says when -- the interviewer
6 was asking tell us about your first mission. So
7 would one of those or both of those be your
8 first mission then? Is Jeff accurate in that?

9 A. Timeline, yes, that would be an
10 accurate statement.

11 Q. But they were both happening the same
12 day?

13 A. Correct.

14 Q. And so --

15 A. And actually just -- if I can jump back
16 to -- what was that one? I know I saw his name
17 here a second ago. What exhibit do you have
18 here? That is 16, David Olsen, which was the
19 one who had done that by himself, is also listed
20 in that report from the 11th there.

21 Q. Okay. And so this is talking about
22 from what you said the mission -- I'm sorry if I
23 am categorizing that wrong now.

24 When you attended the funeral service

1 in Greeley, Colorado, you had stated before that
2 was on November 11, 2005?

3 A. Correct, veterans Day.

4 Q. In here Jeff says "and we hadn't been
5 in existence but maybe two days and this one
6 rider rode up there." Is that your
7 understanding of when the Patriot Guard Riders,
8 whatever it's called, organization, association,
9 group, came in to being?

10 A. That would be my understanding with the
11 emails that started out there.

12 (Applicant's Exhibit 18 was
13 marked for identification.)

14 BY MR. O'MALLEY:

15 Q. Okay. This is Applicant's Exhibit
16 No. 18, which is produced by Jeff Brown and
17 identified as BROWN 010354. Can you take a look
18 at this document and tell me what it appears to
19 be?

20 A. It looks like this is David Olsen
21 reaching out to Jeff saying, hey, we've also got
22 this one on Veterans Day there as well, and the
23 WBC folks are looking like they're going to be
24 there, so let's go ahead and -- let me know if I

1 can do anything to help since he's in the area.

2 Q. Okay. And this is a funeral in Hudson,
3 Wisconsin, so this is what you were referring to
4 before?

5 A. Correct.

6 Q. Okay. And so this is the one where one
7 person showed up?

8 A. Yes.

9 Q. Okay.

10 A. That would be David.

11 Q. Do you know -- and if you don't know,
12 please tell me, but do you know whether this
13 David Olsen advised other individuals that he
14 was with the Patriot Guard Riders?

15 A. I specifically can't answer that.

16 Q. Do you know whether he did something
17 similar to what you did, printing out the logo
18 and putting it on his bike?

19 A. I'm not certain he did that either.

20 (Applicant's Exhibit 19 was
21 marked for identification.)

22 BY MR. O'MALLEY:

23 Q. You don't know, okay. That's fine.

24 Okay. This is Applicant's Exhibit No. 19, which

1 was produced by PGR and is identified as
2 PGR 002226 through PGR 002227. This document
3 again has two separate emails associated with
4 it. If you go kind of midway down, there is a
5 note that says "Original Message" and says from
6 Jeff Brown, sent Friday, November 11, 2005, at
7 9:28 p.m., which is sent to a number of people
8 and associations, and your name appears to be
9 included in that list. Is that correct?

10 A. That is correct.

11 Q. Okay. And the subject of this says
12 "PGR Mission Statement - Important!" And Jeff
13 says, "Hey Folks, I need to know if anyone has
14 any problems with or suggestions for this as our
15 PGR Mission Statement. Your feedback ASAP would
16 be greatly appreciated. This will be on our
17 website. Thanks, Jeff Brown 'Twister,' Broken
18 Arrow, OK, Patriot Guard Rider,
19 www.patriotguard.org." And below that is a
20 Patriot Guard Riders mission statement.

21 A. Yes.

22 Q. What was Jeff asking for here?

23 MS. PERRY: Objection. That calls for
24 speculation.

1 BY MR. O'MALLEY:

2 Q. In your impression -- you received this
3 email -- what did you think Jeff was asking for?

4 A. In my opinion he was soliciting
5 feedback for the mission statement, what may or
6 may not need to be changed in that before it got
7 posted to the website.

8 Q. Okay. And the email at top here is
9 from somebody by the name of Preacher, dated
10 Friday, November 11, 2005, at 9:30, sent back to
11 Jeff Brown as well as to you and to everybody
12 else that was on the original email; is that
13 correct?

14 A. Correct.

15 Q. And what is Preacher's response?

16 A. Basically making a tweak to it saying
17 let's make it gender neutral there from the way
18 it originally read.

19 Q. Okay. So there is something in this
20 Patriot Guard Riders mission statement that Jeff
21 sent out --

22 A. Right.

23 Q. -- which was not gender neutral?

24 A. That's what I'm looking for here. It

1 might have been under No. 1, "our fallen hero,
2 his family, and his community."

3 (Applicant's Exhibit 20 was
4 marked for identification.)

5 BY MR. O'MALLEY:

6 Q. Okay. Thank you very much. This is
7 Applicant's Exhibit No. 20, which was produced
8 by Jeff Brown. It is identified as BROWN008007
9 through BROWN008008. Okay. Again, here there
10 are two email messages as a part of this
11 document. The first identified not quite midway
12 down again says "Original Message." It's from
13 Jeff Brown, dated Friday, November 11, 2005,
14 8:48 p.m., to Wallin, Jason D., and that's you,
15 correct?

16 A. Yes.

17 Q. Okay. Can you read what Jeff has
18 stated in his email?

19 A. "Jason, I hate to be a pain in the ass,
20 but if you get a minute, could you throw this up
21 on the web page. Please don't be bashful about
22 letting me know if I'm taking advantage.
23 Thanks, Jeff." And then the mission statement
24 below that.

1 Q. Okay.

2 A. And it looks like the one with the
3 changes in it.

4 Q. With the changes, so that it's now
5 gender neutral?

6 A. Correct.

7 Q. Okay. How do you know that?

8 A. Under No. 1 there we've got "fallen
9 heroes, their families, and their communities."

10 Q. Okay. As opposed to what it said
11 before, "his family and his community"?

12 A. Correct.

13 Q. Okay. And then in response to that you
14 send an email, appears later that night, and you
15 said "Done"?

16 A. Right. I am assuming I threw it up on
17 the web page.

18 Q. So at that point in time, the web
19 page -- what does the web page have on it?

20 A. It probably has a logo and a mission
21 statement, and that's about it.

22 Q. And nothing else, okay. I'm sorry.
23 Let me back up with a question. The mission
24 statement, can you tell me a little about what

1 that is, what it means?

2 A. In my opinion it's, you know, what is
3 the overarching guiding principles of an
4 organization, you know. This is what we do, and
5 this is how we do it.

6 Q. Okay. And so what do you do? How do
7 you do it?

8 A. Correct.

9 Q. No, I'm asking. I'm sorry.

10 A. So basically, and I am going to go back
11 to your text here, that the Patriot Guard Riders
12 is an amalgamation of riders from across the
13 nation. They do one thing in common besides
14 motorcycles. It's the unwavering respect for
15 those who risk their lives for America's freedom
16 and security, you know. If you share that
17 respect, please join us.

18 And then the what we do is the show
19 respect for our fallen heroes, their families,
20 and their communities and then also protect the
21 mourning families from any interruptions created
22 by any protestor or group of protestors.

23 MR. O'MALLEY: Can we take another
24 five-minute break?

1 MS. PERRY: Thank you.

2 (Recess taken.)

3 MR. O'MALLEY: Can we go back on the record,
4 please. I am going to pass out Applicant's
5 Exhibit No. 21.

6 (Applicant's Exhibit 21 was
7 marked for identification.)

8 BY MR. O'MALLEY:

9 Q. Okay. Applicant's Exhibit No. 21 was
10 produced by Patriot Guard Riders, and it is
11 identified as PGR 002228. This is an email from
12 Jeff Brown dated Saturday, November 12, 2005,
13 again sent to a large number of people, and I
14 believe your name is included in there. Is that
15 correct?

16 A. Yes, it is.

17 Q. Okay. And the subject is "Revised PGR
18 Mission Statement." Jeff says in there, "The
19 PGR Mission Statement has met with approval
20 after some modification. The statement was
21 rewritten to be gender neutral. I realize the
22 sacrifice and dedication of our women in service
23 and did not mean to omit them. I appreciate
24 everyone who caught that error and brought it to

1 my attention. The revised mission statement is
2 now up and running on our website. I owe you
3 all an apology for an unintentional oversight on
4 my part. Sincerely, Jeff Brown 'Twister.'"

5 When Jeff says that the mission
6 statement has met with approval, what in your
7 opinion is he stating there?

8 A. The consensus had been reached amongst
9 everybody that he had sent that out to.

10 Q. Amongst the individuals identified on
11 this email?

12 A. Yes.

13 Q. And then he is noting -- I apologize.
14 Let me back up here. He says, "The statement
15 was rewritten to be gender neutral." Is that --

16 A. Right.

17 Q. -- in accordance with the previous
18 exhibits we discussed?

19 A. Yes, based on Dave Slocum's request
20 there.

21 Q. Okay. And then where he says, "The
22 revised mission statement is now up and running
23 on our website," why is he saying that?

24 MS. PERRY: Objection, speculation. It calls

1 for speculation.

2 MR. O'MALLEY: Okay. You can answer if you
3 know.

4 A. I don't know right offhand, but I would
5 assume that it was after -- the previous email
6 had went out at 10:30 at night when I said I
7 posted it there, and this is 6:43 the next
8 morning so --

9 (Applicant's Exhibit 22 was
10 marked for identification.)

11 BY MR. O'MALLEY:

12 Q. Okay. That's good. Thank you. Next
13 document is Applicant's Exhibit No. 22, which
14 was produced by Jeff Brown and identified as
15 BROWN 010378 through BROWN 010380. Do you
16 recognize this document?

17 A. It looks like an email chain between
18 Jeff and I here.

19 Q. Okay. And what are the relevant dates
20 of these emails?

21 A. It would be the day after Veterans Day
22 in '05.

23 Q. So that date is November --

24 A. Twelfth.

1 Q. Twelfth. Can I direct you to the email
2 at the bottom of the first page, BROWN 010378.

3 A. Okay.

4 Q. It says "Original Message," and it's
5 from Jason Wallin. That's you --

6 A. Right.

7 Q. -- sent November 13, 2005, to Jeff
8 Brown?

9 A. Right.

10 Q. Skip to the second sentence. You say
11 "Btw," which again I assume means by the way,
12 "do we have anyone near Galesburg, IL for
13 Tuesday?"

14 A. Right.

15 Q. And then Jeff sent a response. What
16 was his response?

17 A. "I don't think so, I spent several
18 hours last night searching the Internet for
19 Illinois based bike groups and sending out a
20 'mission call' to all of them. Hopefully we'll
21 get some response today."

22 Q. Okay. When he is talking here, who is
23 he saying -- when he says we'll get some
24 response today --

1 A. I would assume he means the
2 organization.

3 Q. Okay. And in response to Jeff Brown's
4 email, you sent a reply email on Sunday,
5 November 13, at 8:12 a.m., so it looks like a
6 couple hours later. What did you tell him?

7 A. That I used to live in that neck of the
8 woods and let me see if I can find anybody out
9 there.

10 Q. So what was your intent behind this
11 email? What were you going to do?

12 A. Try to find some folks that would be
13 willing to help at that time, be there at that
14 service.

15 (Applicant's Exhibit 23 was
16 marked for identification.)

17 MR. CALLAS: Off the record.

18 (Discussion off the record.)

19 BY MR. O'MALLEY:

20 Q. Back on the record. This is
21 Applicant's Exhibit No. 23, which was produced
22 by Patriot Guard Riders and is identified as
23 PGR 002231. This is an email dated November 15,
24 2005, from Jeff Brown to a number of people.

1 Are you identified as one of the
2 recipients of this email?

3 A. Yes.

4 Q. Where is that?

5 A. Jasonw@geoveritas.

6 Q. So that was one of the email addresses
7 you used at the time?

8 A. That was one of my email addresses at
9 the time, yes.

10 Q. Can you read this email for me?

11 A. "Our webmasters, Jason 'Waldo' Wallin
12 and Hugh Knaus, have been burning the midnight
13 oil on our new web site. I've seen the
14 preliminary and it will blow you away!!

15 "Anyway, I need each of you to email me
16 a photograph of you to post on the new site. As
17 a state captain, our members need to be able to
18 put a face with your name and to know who to
19 look for when they join a mission ride."

20 Q. Okay. Going back, your name, it says
21 "Jason 'Waldo' Wallin." What is Waldo?

22 A. That was my screen name that I used on
23 the site and kind of my ride name that I had
24 back then too.

1 Q. A ride name, okay. The number of
2 people that are under the "To" category as to
3 who this email is being sent is a lot less than
4 the number of people who have been in the
5 previous emails sent by Jeff Brown it appears.
6 Is there a reason for this?

7 A. I think this was the initial winnowing
8 and putting leadership in in each one of the
9 states as we had experience and contact and
10 touch points.

11 Q. Okay. And so at this point in time, he
12 says that you and Hugh Knaus "have been burning
13 the midnight oil on our new web site." Who is
14 "our" referring to?

15 A. The organization.

16 Q. Okay. And then he says, "I've seen the
17 preliminary and it will blow you away!!"

18 So what is the status of the website at
19 that time?

20 A. We had sent him a link of where to look
21 at it. I believe we still had the placeholder
22 up at this time getting ready to turn it on
23 sometime thereafter.

24 Q. So you had it up --

1 A. Yes, but not at www.patriotguard.org
2 yet.

3 Q. It was somewhere else?

4 A. Right.

5 Q. Okay. I will be honest. I don't
6 really know how that works.

7 Okay. But so Jeff was able to see
8 this, and so he had seen a preliminary of it?

9 A. Yes.

10 Q. Okay. Put that one away. Let's go
11 back to Applicant's Exhibit No. 14, which is the
12 trademark application. Can you take a look over
13 this document, just get yourself familiar with
14 it before I start asking questions?

15 A. Okay. Okay.

16 Q. Just going back to basics, what is this
17 application for?

18 A. Basically after Jeff had left the
19 organization, we found out as an organization
20 that it wasn't trademarked and --

21 Q. What was "it"? I'm sorry.

22 A. The logo or anything revolving around
23 the name Patriot Guard or Patriot Guard Riders
24 or any of the marks we had used as the group.

1 So basically at the direction of the board of
2 directors, it was unanimously decided that I
3 would go fill out the web form here and we would
4 apply for the trademark.

5 Q. Okay. You said it was a unanimous
6 decision of the board of directors?

7 A. Right.

8 Q. Who was on the board of directors at
9 that time? Actually, let's step back. What
10 date was this application filed?

11 A. It looks like November 9, 2006.

12 Q. Okay. So as of that day, who is on the
13 board of directors for Patriot Guard Riders?

14 A. Myself, Ed Mueller, Ron Awtry, Bonnie
15 Cutler, Snap and -- or Bill Lines, I should say,
16 and I can't remember if Bill Richart was a forum
17 moderator or on the board at that time.

18 Q. Okay. Going through here, if you
19 scroll to the third page, at the top it says
20 "Correspondence Information"?

21 A. Okay.

22 Q. And then you get down to the signature
23 information. It says "Signature" and then
24 forward slash, "Jason D. Wallin," forward slash,

1 "Signatory's Name, Jason D. Wallin, Signatory's
2 Position, Treasurer, Patriot Guard Riders, Inc.,
3 date signed 11/09/2006."

4 As of November 9, 2006, were you the
5 treasurer for Patriot Guard Riders, Inc.?

6 A. I believe so.

7 Q. Okay. Can you come with me to the next
8 page where there is a statement that says
9 "Declaration," and I am going to kind of read
10 through this and then stop at certain points
11 here. It says, "The undersigned, being hereby
12 warned that willful false statements and the
13 like so made are punishable by fine or
14 imprisonment, or both, under 18 U.S.C. Section
15 1001, and that such willful false statements,
16 and the like, may jeopardize the validity of the
17 application or any resulting registration,
18 declares that he/she is properly authorized to
19 execute this application on behalf of the
20 applicant."

21 Were you properly authorized to execute
22 this application on behalf of PGR, Inc.?

23 A. The board said yes.

24 Q. Okay. The next part says, "He/she

1 believes the applicant to be the owner of the
2 trademark/service mark sought to be registered."

3 Did you believe the PGR, Inc. to be the
4 owner of the trademark/service mark sought to be
5 registered?

6 A. It was used as a function of the group,
7 yes.

8 Q. Okay. Let's skip the next part because
9 that doesn't apply to this application. Going
10 down, there is a part that says, "To the best of
11 his/her knowledge and belief" -- are you with
12 me? You have to skip about a line and a half.

13 A. Oh, okay.

14 Q. Okay. It says, "To the best of his/her
15 knowledge and belief no other person, firm,
16 corporation, or association has the right to use
17 the mark in commerce, either in the identical
18 form thereof or in such near resemblance thereto
19 as to be likely, when used on or in connection
20 with the goods/ services of such other person,
21 to cause confusion, or to cause mistake, or to
22 deceive."

23 Was that true at the time to the best
24 of your knowledge and belief that no other

1 person had the right to use the mark?

2 A. To the best of my knowledge -- the mark
3 itself had been created by Jeff. There is no
4 debate about that.

5 Q. What do you mean by created?

6 A. Physically took the paintbrush or
7 whatever tool he uses inside his computer and
8 drew the logo. I mean we've seen that that was
9 sent forward from the organization there.

10 Q. Okay.

11 A. You know, certainly for the purposes we
12 filed this for, which was, you know, in support
13 of military and military -- support groups for
14 military and military family support, there is
15 no other organization that could use that mark.

16 Q. Okay. At the time when you filed this,
17 were you an attorney?

18 A. No. Still not one today.

19 Q. Not one today. That was my next
20 question.

21 Had you ever filed a trademark
22 application before?

23 A. No.

24 Q. Did you ever have any in-depth

1 knowledge with regard to trademarks prior to
2 this filing?

3 A. No, other than there was a little R
4 down at the bottom of some logos, and that's
5 about the extent that I knew anything about it.

6 MR. O'MALLEY: Okay. Can we take two minutes
7 here? Can we just take a very quick break?

8 (Recess taken.)

9 BY MR. O'MALLEY:

10 Q. Back on the record, please. Okay. So
11 based on all of the exhibits that we have talked
12 about today and reviewed, who is it in your
13 opinion that is the owner of the trademark?

14 A. The organization, and that's just an
15 opinion. As we said, I'm not a lawyer, but
16 that's my opinion.

17 Q. Sure. Was it your understanding that
18 Jeff Brown owned any trademark rights in the
19 mark?

20 A. He had asserted that he had, but, you
21 know, I think because of the fact that it was
22 used as an organization before it was used as
23 the other, you know, from what I've come to
24 believe, that that does make it the

1 organization's.

2 Q. Did you ever see or hear of Jeff Brown
3 using the Patriot Guard Riders trademark as an
4 individual?

5 A. Can you give me a little clarification
6 on the question?

7 Q. Did he ever use the mark himself other
8 than when and if he acted on behalf of the
9 organization?

10 A. When he sold stuff in his store, that
11 was his personally.

12 Q. Did you know that at the time -- or I'm
13 sorry. When did you become aware that he was
14 selling stuff on his own?

15 A. It was pretty early on. With that
16 said, I believe it would have been -- it would
17 have been somewhere between the point of when we
18 put the initial website up to the point that he
19 put his own separate website up, which I think
20 was the Patriot Guard store.

21 Q. I'm sorry. Can you repeat that?

22 A. Okay. Basically, there were two
23 separate websites for this, one being the store
24 which was Jeff's, Jeff controlled. We didn't do

1 any update or contact control of, and then there
2 was the patriotguard.org website, which was up
3 first, you know, on November 11.

4 Q. Okay. Just give me a second here. Why
5 did you think that Jeff was using the trademark
6 as an individual rather than on behalf of the
7 organization?

8 A. You mean using the logo?

9 Q. Using the logo, yes. I'm sorry.

10 A. Because he said he was.

11 Q. Okay. Do you have any personal
12 knowledge to know whether he actually had any
13 rights in the logo?

14 MS. PERRY: Objection. That's calling for a
15 legal conclusion.

16 MR. O'MALLEY: Okay.

17 A. Right, and I don't.

18 MR. O'MALLEY: You don't, okay. We are
19 finished.

20 CROSS-EXAMINATION

21 BY MS. PERRY:

22 Q. I'm Jenna Perry, and I'm the attorney
23 representing Jeff Brown in Opposition 91181448.
24 I am going to ask you a series of questions, and

1 I would like for you to answer them as fully and
2 truthfully as possible. You understand that you
3 are still under oath, correct?

4 A. Yes, ma'am.

5 Q. So you have the duty to answer each
6 question fully and truthfully, correct?

7 A. Correct.

8 Q. If you don't understand a question,
9 will you tell me?

10 A. You bet.

11 Q. Some of these questions are going to be
12 redundant, but I ask for your patience and
13 request that you answer each question truthfully
14 and fully as if I asked it for the first time.

15 Okay. Let's begin. You stated that
16 you were in the military for three years; is
17 that correct?

18 A. Two years.

19 Q. Two years?

20 A. From '96 to '98.

21 Q. Okay. Why did your military career
22 end? Can you explain that?

23 A. It was a hardship discharge I received.

24 Q. Can you explain further?

1 A. Sure. Okay. Basically it was a matter
2 of I was sent -- or scheduled to be sent for a
3 three-year unaccompanied tour in Germany, and it
4 was going to pose a hardship for my wife and my
5 two kids that were here.

6 Q. Okay. And so what did you do?

7 A. Got a hardship discharge.

8 Q. Okay. Have you ever been convicted of
9 a crime?

10 A. Nope.

11 Q. Have you ever been charged with a
12 crime?

13 A. No.

14 Q. Have you ever been accused of a crime
15 by someone associated with PGR, Inc.?

16 MR. O'MALLEY: Objection, relevance, beyond
17 the scope of direct.

18 MS. PERRY: It goes to impeachment of the
19 witness, so it is absolutely relevant, but you
20 answer anyway.

21 A. I am going to go ahead and seek my
22 Fifth Amendment rights here.

23 Q. This isn't a criminal case.

24 MR. CALLAS: For the record, the reason I am

1 here is because I am here to accompany Jason.
2 Depending on the types of questions, he will be
3 asserting his right to the Fifth Amendment,
4 which he may do under the law, and I will be
5 instructing him not to answer the questions
6 where he feels uncomfortable and he asserts his
7 right.

8 BY MS. PERRY:

9 Q. Okay. You understand that with some of
10 these questions, if you refuse to answer them, I
11 can get a motion to compel and get the answers,
12 correct?

13 MR. CALLAS: Absolutely.

14 BY MS. PERRY:

15 Q. And we will have to redo this.

16 Mr. Wallin, who is your attorney?

17 A. John Callas.

18 Q. Is Mr. O'Malley your attorney in any
19 capacity?

20 A. No.

21 Q. Have you spoken with Mr. O'Malley or
22 any other attorney with his firm before the
23 deposition today?

24 A. Yes, when he sought my testimony.

1 Q. Explain your communications with

2 Mr. O'Malley or anybody at his law firm.

3 A. Basically they had some questions on
4 what was filed and how that was -- why
5 everything was filed the way that it was, and he
6 had asked for that about a year ago, I believe,
7 give or take. There were some statements he
8 asked me to put together as a part of this
9 trademark opposition, and then three, four weeks
10 ago, we started talking again, I believe.

11 Q. How much have you talked to
12 Mr. O'Malley or anyone at his law firm in the
13 past few weeks?

14 A. We'd had one conversation around
15 scheduling it with my ability and John's ability
16 to be here to do this and then one brief 15-,
17 20-minute conversation around some questions
18 they had.

19 Q. Okay. And is that all?

20 A. That's it.

21 Q. Okay. Did you look at any of the
22 documents that were identified as exhibits
23 before coming in today during the past few
24 weeks?

1 A. There was a copy that was provided to
2 my attorney, and we covered those before today's
3 session.

4 Q. Did you speak to anyone besides
5 Mr. O'Malley or someone associated with his firm
6 or your own attorney prior to coming to the
7 deposition today about the matters in this
8 deposition?

9 A. Help me clarify on that. Are you
10 talking somebody involved as a party to this?

11 Q. Right. Anybody at the PGR, Inc. or
12 otherwise.

13 A. No, I have not spoken to anybody in the
14 PGR organization leadership-wise in a year, year
15 and a half.

16 Q. Why?

17 A. At my choice. They have asked me many
18 times to reach out to them, but I haven't
19 reached out to them.

20 Q. Are you still a member of PGR, Inc.?

21 A. I believe I have an account out there.
22 I haven't accessed it on the website in several
23 years.

24 Q. Why?

1 A. Because it's better for the
2 organization that I not be an active member.

3 Q. Why?

4 A. Because that's my belief.

5 Q. Do you presently have any position at
6 the PGR, Inc.?

7 A. No.

8 Q. What was your last position at the PGR,
9 Inc.?

10 A. It was a board member.

11 Q. Specifically, what member of the board?

12 A. Board member at large because -- is
13 what the last position I had was.

14 Q. Were you terminated from that position?

15 A. It just didn't work out.

16 Q. Explain why not.

17 A. I am going to need a couple minutes
18 here -- excuse me -- for recess with my counsel.

19 Q. After you answer the question, please.

20 A. What was the question again? I'm
21 sorry.

22 MS. PERRY: Can you read the question back
23 from the transcript, please.

24 (Record read.)

1 A. And I will answer that question in
2 saying that I was becoming a hindrance to the
3 organization.

4 BY MS. PERRY:

5 Q. Can you explain further?

6 THE WITNESS: Can I have my recess?

7 MS. PERRY: You may.

8 THE WITNESS: Thank you.

9 (Recess taken.)

10 MS. PERRY: Back on the record. Will you
11 read back the prior question before the break.

12 (Record read.)

13 A. Basically, to answer that, there
14 were -- I had tendered my resignation for the
15 position specifically due to some personal and
16 other issues there, and at that point that was
17 when I was no longer part of the organization's
18 board of directors.

19 BY MS. PERRY:

20 Q. Did anyone ever ask you to resign?

21 A. No.

22 Q. How soon thereafter did you become
23 uninvolved with PGR, Inc.?

24 A. It was roughly the same period of time.

1 Q. And when was that?

2 A. I am going to have to go back to my
3 notes here. My attorney has that information,
4 if you would bear with me just a moment.

5 It would have been approximately
6 September of '07.

7 Q. So in approximately September of '07,
8 you resigned your position with the board of
9 directors and basically became uninvolved with
10 PGR, Inc.; is that correct?

11 A. That is correct.

12 Q. And did you say since September of '07
13 when you resigned, you haven't had contact with
14 members of the PGR, Inc. since that time?

15 A. I've had sporadic contact with a few of
16 the board members but only in very limited
17 fashion since then and no contact in the last 12
18 to 18 months.

19 Q. Do you own a corporation?

20 A. I do not.

21 Q. Have you ever owned a corporation?

22 A. Yes.

23 Q. Why did you secure the domain name
24 www.patriotguard.org?

1 A. For the organization.

2 Q. Let me be a little bit more clear on
3 that question. Did you choose that from a
4 variety of names? Did you, for example, search
5 other names as well at the time that you were
6 registering the domain name?

7 A. Yeah. I believe we tried to get
8 pgr.org and some of the other ones, the shorter
9 names. That was the shortest name that was
10 available.

11 Q. But you searched other names as well?

12 A. Yes, for pgr.org and some other ones.

13 Q. Do you remember what other domain names
14 you searched at that time?

15 A. I think the one we wanted was pgr.org.

16 Q. Pgr.org?

17 A. Yes, but that wasn't available.

18 Q. Anything else?

19 A. I think we looked at the dot-com and
20 that was a homeland security product for banks.

21 Q. Patriotguard.com or pgr.com?

22 A. Patriotguard.com.

23 Q. And that one was --

24 A. Taken as well. Beyond that I don't

1 recall any.

2 Q. On Applicant's Exhibit No. 11, in your
3 email to Jeff Brown, you stated that you meant
4 the organization when you put by the way, "Btw
5 you now own patriotguard.org domain name and I
6 can host it for you for free."

7 A. Yes.

8 Q. You stated earlier that you meant the
9 organization?

10 A. Right.

11 Q. Then why didn't you put the
12 organization instead of "you"?

13 A. At this point if we look through the
14 mail stack going out, I mean it's going -- on
15 the 9th we are talking two people. On
16 Applicant's Exhibit -- let me see if I can find
17 one of those -- basically it was us at that
18 time, right? I mean it was -- you know, even by
19 the 10th, we are talking what, 15 names maybe.
20 I can count them but -- 22 in Exhibit 13.

21 Q. So you did not consider it an
22 organization at that time that you wrote this
23 email?

24 A. Define organization for me.

1 Q. You state here, "Btw you now own
2 patriotguard.org domain name and I could host it
3 for you for free."

4 A. Right.

5 Q. Why did you write "you" rather than the
6 organization or we?

7 A. Jeff was the contact point at this
8 point too for the group that was putting the
9 mail together -- or the emails together that we
10 are talking about at this point so --

11 Q. That didn't really answer the question.

12 A. I guess it would be poor phrasing on my
13 part, but with that said, you know, at this
14 point this is email between Jeff and I, right,
15 would be my contention with that, that that is
16 the root of the national organization at that
17 point.

18 Q. On November 9, 2005, had there been any
19 rides by Patriot Guard Riders at that point?

20 A. Not on the 9th that I was aware of.

21 Q. Do you know when the organization, the
22 not-for-profit organization, PGR, Inc. was first
23 incorporated?

24 A. Jeff had done that, I believe, and I

1 would have to check. They were both
2 incorporated February '06, I believe, in that
3 neighborhood there.

4 Q. Okay. When you say they were both
5 incorporated, what do you mean?

6 A. Both Jeff's PGR store and the Patriot
7 Guard organization.

8 Q. And did you know at the time that Jeff
9 incorporated his separate organization that he
10 did that?

11 A. Well, he had already incorporated it
12 because that was a couple days before our
13 organization was incorporated, and I mean on his
14 personal dealings he wasn't including me on
15 those.

16 Q. But did you know that at that time?

17 A. At what time?

18 Q. At the time that he incorporated it.

19 A. Which one?

20 Q. Either one.

21 A. First one, no. The second one, he may
22 or may not have shared that with me. I don't
23 know.

24 Q. When did you find out about his

1 personal LLC?

2 A. It was right in the same time that the
3 Patriot Guard was incorporated.

4 Q. So you found out about Jeff Brown's
5 separate PGR, LLC at approximately the same
6 time --

7 A. Approximately.

8 Q. -- that the PGR not-for-profit --

9 A. Was incorporated.

10 Q. -- was incorporated, yes?

11 A. Yes.

12 Q. Okay. What did you know he was doing
13 with the LLC at that time?

14 A. The Patriot Guard organization LLC or
15 the Patriot Guard store LLC?

16 Q. Okay. Let me define each one of them.

17 A. Okay.

18 Q. The PGR, LLC, the limited liability
19 company, is what Jeff Brown owned and his wife.

20 A. Okay.

21 Q. The Patriot Guard not-for-profit
22 organization is what I'm referring to as PGR,
23 Inc. or Patriot Guard Riders, Inc.

24 A. Okay. So for future terms, just for

1 clarification, PGR, Inc. is the --

2 Q. The not-for-profit organization.

3 A. The not-for-profit organization. The
4 other piece of that was --

5 Q. LLC is the one that was owned by him
6 specifically.

7 A. Okay.

8 MS. PERRY: Now I have forgotten the question
9 that I asked. Can you read it back.

10 (Record read as follows:

11 "Q Okay. What did you know he was
12 doing with the LLC at that time?")

13 A. Okay. So just to be clear, the LLC
14 being Jeff's corporation?

15 BY MS. PERRY:

16 Q. Correct.

17 A. Okay. He was selling goods and
18 service -- or goods for -- sweatshirts, flags,
19 and that type of stuff.

20 Q. Okay. When was the first time that you
21 brought the LLC to anyone else's attention and
22 that being Jeff Brown's separate --

23 A. I cannot give you an exact date on
24 that.

1 Q. Can you give us some kind of an
2 approximation?

3 A. I'm trying to think. That would be
4 either Kurt or Ronny and I just -- I mean it
5 would be sometime after they were both
6 incorporated.

7 Q. Shortly after?

8 A. I honestly can't tell you an exact date
9 or even month in which I would have done that.

10 Q. You stated that you hosted the
11 www.patriotguard.org site. What dates did you
12 host that?

13 A. Basically the inception through the
14 time which I resigned from the Patriot Guard
15 organization.

16 Q. So the entire time --

17 A. Yes.

18 Q. -- you were involved with the Patriot
19 Guard?

20 A. (Witness nodding.)

21 Q. Yes?

22 A. Yes. I'm sorry. I didn't realize I
23 nodded.

24 Q. During that time did you place Google

1 ads on the patriotguard.org website?

2 MR. O'MALLEY: Objection as to the relevance
3 and beyond the scope of the direct examination.

4 MS. PERRY: You can answer.

5 A. Yes, I did.

6 Q. What did you do with the money from the
7 Google ads?

8 A. Reinvested in technology that I was
9 paying for out of pocket.

10 Q. Were you ever asked by one of the board
11 members at the PGR, Inc. to turn over the
12 transaction records for the PGR checking
13 account?

14 MR. O'MALLEY: Objection, goes beyond the
15 scope and irrelevant.

16 MS. PERRY: You can answer the question.

17 MR. CALLAS: I can't tell you. I mean --

18 A. All right. I am going to assert my
19 Fifth Amendment rights here.

20 BY MS. PERRY:

21 Q. Being requested to turn over
22 transaction records does not implicate you of a
23 crime.

24 Were you ever given a 1099 by PGR,

1 Inc.?

2 MR. O'MALLEY: Objection, irrelevant, goes
3 beyond the scope of direct examination.

4 A. Yes, I was.

5 BY MS. PERRY:

6 Q. For what amount and what was the legal
7 justification?

8 MR. O'MALLEY: Objection, compound question.

9 BY MS. PERRY:

10 Q. For what amount?

11 A. Can I have a conference with my
12 attorney for a moment here?

13 Q. Let's proceed.

14 MR. CALLAS: Okay. Next question?

15 BY MS. PERRY:

16 Q. For what amount?

17 A. I am not sure of the exact number right
18 now. I will get back to you with that, though.

19 Q. And what was the reason?

20 A. And I am going to assert my Fifth
21 Amendment rights right about here.

22 Q. Have you ever been contacted by the FBI
23 or any other law enforcement agency regarding
24 the embezzlement of PGR funds?

1 MR. O'MALLEY: Objection, irrelevant and
2 beyond the scope of direct examination.

3 A. The answer is no.

4 BY MS. PERRY:

5 Q. Have you ever been contacted by the IRS
6 or any other governmental agency regarding
7 embezzlement of PGR, Inc. funds?

8 MR. O'MALLEY: Objection, irrelevant, and
9 beyond the scope of direct examination.

10 A. No.

11 BY MS. PERRY:

12 Q. Are you aware of anyone else ever
13 taking funds designated for the PGR, Inc.?

14 MR. CALLAS: Objection, and I am not even a
15 party, but "anyone else" has a negative
16 connotation to it, Counsel.

17 BY MS. PERRY:

18 Q. Are you aware of anyone aside from
19 yourself taking any funds designated for the
20 PGR, Inc., excepting yourself out of this?

21 MR. CALLAS: Can you start over with a new
22 question, Counsel? I think I know what you want
23 to do, but I think the way it was phrased there
24 is going to end up with him asserting his Fifth

1 Amendment privilege.

2 MS. PERRY: I understand.

3 Q. Who authorized you to file the
4 trademarks for the PGR, Inc.?

5 A. The board of directors.

6 Q. How was that accomplished?

7 A. Via telephone call, board meeting.

8 Q. Conference call?

9 A. Yes.

10 Q. Whose idea was it to file this
11 trademark application Serial No. 77040379 for
12 the Patriot Guard Riders Riding with Respect
13 design application?

14 MR. O'MALLEY: Exhibit 14?

15 MS. PERRY: That is correct, Exhibit 14, yes.
16 It's the one that you filed on behalf of the
17 PGR, Inc.

18 A. Okay. It was the board's idea to do
19 that.

20 Q. Who in the board first came up with the
21 idea?

22 A. It was probably Ed Mueller and myself
23 talking.

24 Q. Talking about what?

1 A. When we discovered that it hadn't been
2 filed.

3 Q. How did you discover that it had not
4 been filed?

5 A. I believe it was a web search that
6 either he did or I did. I don't remember who at
7 this point.

8 Q. What prompted either of the two of you
9 to have run this web search?

10 A. I believe it was -- it came from the
11 claim that it had been trademarked.

12 Q. Whose claim?

13 A. Jeff's.

14 Q. When did Jeff make the claim that you
15 are referencing that the mark had been
16 trademarked?

17 A. I am trying to remember when that would
18 have been. It was via web post. I am not
19 actually sure of the timing of that. It
20 certainly would have been after February but
21 before November of 2006.

22 Q. Why was the search not done earlier?

23 A. I believe the belief of everybody was
24 that it had been done and completed and filed

1 for.

2 Q. What was your belief?

3 A. That he said it was and it was.

4 Q. That who --

5 A. That Jeff had indicated that it had
6 been trademarked.

7 Q. When did Jeff Brown indicate that it
8 had been trademarked?

9 A. Again, I can't give you that exact
10 date, but it would have been after the
11 incorporation but prior to the filing for this,
12 so somewhere between February and November of
13 '06.

14 Q. You stated that you think that the
15 organization owns this trademark, the one that's
16 the subject of Serial No. 77040379 that's in
17 Exhibit 14?

18 A. Yes.

19 Q. Why do you believe that?

20 MR. O'MALLEY: Objection, asked and answered.

21 MS. PERRY: You can answer it again.

22 A. That, you know, it was developed for
23 this organization or this group, Patriot Guard
24 Riders.

1 Q. Why do you believe that?

2 A. Because as a service mark or a
3 trademark or whatever it is, it was created to
4 define what it is that the Patriot Guard did by
5 providing comfort to military families.

6 Q. Did you create the mark?

7 A. I did not create the mark.

8 Q. So do you have personal knowledge as to
9 why it was created?

10 A. No, I do not have direct personal
11 knowledge.

12 Q. Do you have knowledge other than
13 speculation as to why you stated the reason it
14 was created?

15 A. Well, define speculation then for me in
16 this case here because -- or in its use.

17 Q. Do you have any specific evidence or
18 reason to believe, besides just conjecture,
19 speculation, that the mark was created for PGR,
20 Inc.?

21 A. Well, the mark was created four months
22 before either one of those organizations
23 existed, I believe, the legal entity Patriot
24 Guard Riders, but at the same time missions were

1 going on just the same before and after the
2 creation of that organization.

3 MS. PERRY: Let's take a quick break.

4 (Recess taken.)

5 MS. PERRY: I have no further questions.

6 MR. O'MALLEY: Okay. Nor do we.

7 THE REPORTER: What about signature?

8 MR. CALLAS: I would like it to be mailed
9 to him to review.

10

11 (WITNESS EXCUSED.)

12

13

14

15

16

17

18

19

20

21

22

23

24

1 IN THE UNITED STATES
2 PATENT AND TRADEMARK OFFICE
3 BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD
4 JEFF BROWN,
5 Opposer,
6 vs. Opposition
 No. 91181448
7 PATRIOT GUARD RIDERS, INC.,
8 Applicant.

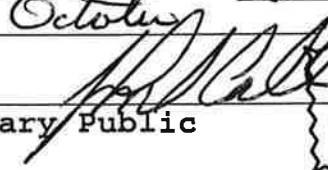
9
10
11
12

13
14 I, JASON DUANE WALLIN, being first duly
15 sworn, on oath say that I am the deponent in the
16 aforesaid deposition taken on August 1, 2011;
17 that I have read the foregoing transcript of my
18 deposition, consisting of pages 1 through 91
19 inclusive, and affix my signature to same.

20
21


JASON DUANE WALLIN

22 Subscribed and sworn to
23 before me this 6 day
24 of October 2011


Notary Public



1 ERRATA SHEET

2 Pg/Ln Correction

3 ___/___ Change from: _____

4 Change to: _____

5 ___/___ Change from: _____

6 Change to: _____

7 ___/___ Change from: _____

8 Change to: _____

9 ___/___ Change from: _____

10 Change to: _____

11 ___/___ Change from: _____

12 Change to: _____

13 ___/___ Change from: _____

14 Change to: _____

15 ___/___ Change from: _____

16 Change to: _____

17 ___/___ Change from: _____

18 Change to: _____

19 ___/___ Change from: _____

20 Change to: _____

21 ___/___ Change from: _____

22 Change to: _____

23

24 Signature: _____ Date: _____

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 10

From: Wallin Jason D. <jasonw@geoveritas.com>
Sent: Wednesday, November 9, 2005 8:18 PM
To: Jeff Brown <jeffbrown@valornet.com>
Cc: Husky <HuskyNorsky@hotmail.com>
Subject: RE: PGR - Most recent pickets from WBC site

I live just outside of Greeley and will be there on Friday with 7 confirmed biker patriots we will be trying to meet up about 11:20 and roll in mass. I am currently working with the hog chapters in the area and some of the motorcycle social clubs. His funeral is listed the whole schedule but not on the main page.

As I know more tomorrow I will update you.

Jason Wallin, CISSP
John Deere Agri Services
Fort Collins, CO

970-266-4625
jasonw@geoveritas.com

-----Original Message-----

From: Jeff Brown [mailto:jeffbrown@valornet.com]
Sent: Wednesday, November 09, 2005 6:41 PM
To: Husky; Wallin Jason D.
Subject: PGR - Most recent pickets from WBC site

Hey Guys,
Preacher just sent me your email address to put you on the PGR notification list. Either of you near Beatrice, Nebraska? Let me know and I'll send you details on the ride for Spc. Howe.
Welcome aboard...a couple of things. If you know other riders that want to get involved, regardless of any organization, let me know and I'll put them on the list. Send me any information you want distributed.
Thanks,
Jeff Brown "Twister"
Broken Arrow, OK

=====

Here's what's listed, in case you've not checked their site recently.
If you know riders in these areas, regardless of any group affiliation, pass it along and encourage them to join in a Patriot Guard Ride to honor our fallen heroes and support their families.
If anyone has contact information for rides in these areas, please pass it along to me and I will see it gets out.
Thanks,
Jeff Brown "Twister"
Broken Arrow, OK

=====

BROWN008012

WBC to picket funeral/visitation of Army Spc. Darren D. Howe - at 4 p.m.
Thursday, Nov. 10, at Fox Funeral Home, 1116 N. 19th St., Beatrice,
Nebraska. He was killed by an Iraqi IED

WBC to picket funeral of Army Spc. Benjamin A. Smith - 10 a.m., Fri.,
Nov.
11, at Bethel Lutheran leper colony 920 3rd St., Hudson, Wisc. Killed by
an
Iraqi IED

WBC to picket funeral of Army Maj. Gerald M. Bloomfield II - 4 p.m.
Friday
Nov. 11, Stemm-Lawson-Peterson Funeral Home, Elkhart, Indiana. Killed by
Iraqi IED

No virus found in this incoming message.

Checked by AVG.

Version: 7.5.524 / Virus Database: 269.23.16/1432 - Release Date: 5/14/2008 7:49 AM

BROWN008013

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No.

11

From: Wallin Jason D. <jasonw@geoveritas.com>
Sent: Wednesday, November 9, 2005 8:19 PM
To: Jeff Brown <jeffbrown@valornet.com>
Subject: RE: PGR - Most recent pickets from WBC site

Btw you now own patriotguard.org domain name and I can host it for you for free.

Jason Wallin, CISSP
John Deere Agri Services
Fort Collins, CO

970-266-4625
jasonw@geoveritas.com

-----Original Message-----

From: Jeff Brown [mailto:jeffbrown@valornet.com]
Sent: Wednesday, November 09, 2005 6:41 PM
To: Husky; Wallin Jason D.
Subject: PGR - Most recent pickets from WBC site

Hey Guys,
Preacher just sent me your email address to put you on the PGR notification list. Either of you near Beatrice, Nebraska? Let me know and I'll send you details on the ride for Spc. Howe.
Welcome aboard...a couple of things. If you know other riders that want to get involved, regardless of any organization, let me know and I'll put them on the list. Send me any information you want distributed.
Thanks,
Jeff Brown "Twister"
Broken Arrow, OK

=====

Here's what's listed, in case you've not checked their site recently.
If you know riders in these areas, regardless of any group affiliation, pass it along and encourage them to join in a Patriot Guard Ride to honor our fallen heroes and support their families.
If anyone has contact information for rides in these areas, please pass it along to me and I will see it gets out.
Thanks,
Jeff Brown "Twister"
Broken Arrow, OK
=====

WBC to picket funeral/visitation of Army Spc. Darren D. Howe - at 4 p.m.
Thursday, Nov. 10, at Fox Funeral Home, 1116 N. 19th St., Beatrice, Nebraska. He was killed by an Iraqi IED

BROWN008010

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 12

From: Wallin Jason D. [jasonw@geoveritas.com]
Sent: Thursday, November 10, 2005 11:59 AM
To: Jeff Brown
Subject: FW: Update on Funeral of PFC Tyler MacKenzie

Everyone,

I have notified the Greeley PD that we will be there and they have indicated that they have spaces designated for both of us tomorrow. The map of this location can be found at <http://www.wallininc.com/images/map.gif>. Please remember that we are there to honor Tyler and the sacrifice he made for our country. The local authorities have indicated that Phelps will be there from 11-12 am. These locations may change but the police will be on hand at 10:30 so just ask one of them and they will direct you the proper location. I will be there by 10:45 and can be reached on my cell if there are any questions @ 970-402-1892. Please come out and support this brave hero.

Jason Wallin

The Patriot Guard is made up of all Patriotic Riders, including Clubs, Associations and individuals. Our Mission is Honor the Soldier / support the Family and Shield the Family from the idiots...

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 13

From: Wallin Jason D. <jasonw@geoveritas.com>
Sent: Thursday, November 10, 2005 4:21 PM
To: Jeff Brown <jeffbrown@valornet.com>
Subject: RE: PGR Logo

FYI I threw up a placeholder @ www.patriotguard.org

Jason Wallin, CISSP
John Deere Agri Services
Fort Collins, CO

970-266-4625
jasonw@geoveritas.com

-----Original Message-----

From: Jeff Brown [<mailto:jeffbrown@valornet.com>]
Sent: Thursday, November 10, 2005 1:53 PM
To: William H. Sloan; Phil Mansker; Tom Connelly; Terry (Darkhorse)
Hauck; Richard Keller; Eric G. Gagoniros; Preacher; Ralph and Susan;
LAnnmuillins; Kay Guynes; Keith Calloway; Wallin Jason D.; Knaus Hugh;
Chuck Thompson; Wayne Worthington; David Olsen (STP); Craig Winkler;
Everett Freel; Combat Veterans Motorcycle Association; CREGG HANSEN;
Bill Carr; Bill Law; Bill Bradley
Subject: PGR Logo

Several people have asked about a Patriot Guard Riders patches, decals,
arm
bands flags, etc. I like the idea and believe it will enhance our
presence
at any service without taking anything from the other organizations you
may
belong to.

I have designed a logo that I think works very well for us. I am
working
with a company to produce the stuff and will send out more information
as it
becomes available.

Also, Jason Wallin from Colorado has graciously donated web hosting for
us
and I hope to have a website up soon. The domain name reserved is:
patriotguard.org

I've attached the logo.

Thanks,
Jeff Brown "Twister"
Broken Arrow, OK

No virus found in this incoming message.
Checked by AVG.

Version: 7.5.524 / Virus Database: 269.24.1/1470 - Release Date: 5/28/2005 7:20 AM

BROWN008009

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No.

14

Trademark/Service Mark Application, Principal Register

TEAS Plus Application

Serial Number: 77040379

Filing Date: 11/09/2006

NOTE: Data fields with the * are mandatory under TEAS Plus. The wording "(if applicable)" appears where the field is only mandatory under the facts of the particular application.

The table below presents the data as entered.

Input Field	Entered
TEAS Plus	YES
MARK INFORMATION	
*MARK FILE NAME	\\TICRS\EXPORT2\IMAGEOUT2 \770\403\77040379\xml1\FT K0002.JPG
*SPECIAL FORM	YES
USPTO-GENERATED IMAGE	NO
LITERAL ELEMENT	Patriot Guard Riders Riding with Respect
*COLOR MARK	YES
*DESCRIPTION OF THE MARK (and Color Location, if applicable)	The mark consists of this mark has a yellow field with a blue and white folded American flag and blue text.
*COLOR(S) CLAIMED (If applicable)	yellow, blue, and white
PIXEL COUNT ACCEPTABLE	YES
PIXEL COUNT	900 x 572
APPLICANT INFORMATION	
*OWNER OF MARK	Patriot Guard Riders, Inc.
*STREET	312 Granite Ct
*CITY	Windsor
*STATE (Required for U.S. applicants)	Colorado

*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. applicants only)	80550
PHONE	970-402-1892
EMAIL ADDRESS	jason@patriotguard.org
AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
LEGAL ENTITY INFORMATION	
*TYPE	CORPORATION
*STATE/COUNTRY OF INCORPORATION	Oklahoma
GOODS AND/OR SERVICES AND BASIS INFORMATION	
*INTERNATIONAL CLASS	045
*FIRST USE ANYWHERE DATE	At least as early as 11/11/2005
*FIRST USE IN COMMERCE DATE	At least as early as 06/01/2006
*DESCRIPTION	Organizing and conducting support groups in the field of MILITARY AND MILITARY FAMILY SUPPORT
*FILING BASIS	SECTION 1(a)
*FIRST USE ANYWHERE DATE	At least as early as 11/11/2005
*FIRST USE IN COMMERCE DATE	At least as early as 06/01/2006
SPECIMEN FILE NAME(S)	\\TICRS\EXPORT2\IMAGEOUT2 \\770\403\77040379\xml1\FT K0003.JPG
SPECIMEN DESCRIPTION	this is a sample of a t-shirt that we sold to help raise money for scholarships for the families of fallen soldiers.
ADDITIONAL STATEMENTS INFORMATION	
*TRANSLATION (if applicable)	
*TRANSLITERATION (if applicable)	
*CLAIMED PRIOR REGISTRATION (if applicable)	
*CONSENT (NAME/LIKENESS) (if applicable)	
*CONCURRENT USE CLAIM (if applicable)	

CORRESPONDENCE INFORMATION

*NAME	Patriot Guard Riders, Inc.
FIRM NAME	Patriot Guard Riders, Inc.
*STREET	312 Granite Ct
* CITY	Windsor
* STATE (Required for U.S. applicants)	Colorado
* COUNTRY	United States
* ZIP/POSTAL CODE (Required for U.S. applicants only)	80550
PHONE	970-402-1892
* EMAIL ADDRESS	jason@patriotguard.org
*AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes

FEE INFORMATION

NUMBER OF CLASSES	1
FEE PER CLASS	275
TOTAL FEE DUE	275

SIGNATURE INFORMATION

* SIGNATURE	/Jason D. Wallin/
* SIGNATORY'S NAME	Jason D. Wallin
SIGNATORY'S POSITION	Treasurer, Patriot Guard Riders, Inc.
* DATE SIGNED	11/09/2006

FILING INFORMATION SECTION

SUBMIT DATE	Thu Nov 09 13:14:12 EST 2006
TEAS STAMP	USPTO/FTK-72.250.47.100-2 0061109131412723527-77040 379-3507c3ba14ce17d9c93f0 87827a0f348e6-CC-1533-200 61109113619488470

Trademark/Service Mark Application, Principal Register

TEAS Plus Application

Serial Number: 77040379

Filing Date: 11/09/2006

To the Commissioner for Trademarks:

Correspondence Information: Patriot Guard Riders, Inc.

312 Granite Ct

Windsor, Colorado 80550

970-402-1892(phone)

jason@patriotguard.org (authorized)

A fee payment in the amount of \$275 will be submitted with the application, representing payment for 1 class(es).

Declaration

The undersigned, being hereby warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, and that such willful false statements, and the like, may jeopardize the validity of the application or any resulting registration, declares that he/she is properly authorized to execute this application on behalf of the applicant; he/she believes the applicant to be the owner of the trademark/service mark sought to be registered, or, if the application is being filed under 15 U.S.C. Section 1051(b), he/she believes applicant to be entitled to use such mark in commerce; to the best of his/her knowledge and belief no other person, firm, corporation, or association has the right to use the mark in commerce, either in the identical form thereof or in such near resemblance thereto as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion, or to cause mistake, or to deceive; and that all statements made of his/her own knowledge are true; and that all statements made on information and belief are believed to be true.

Signature: /Jason D. Wallin/ Date: 11/09/2006

Signatory's Name: Jason D. Wallin

Signatory's Position: Treasurer, Patriot Guard Riders, Inc.

RAM Sale Number: 1533

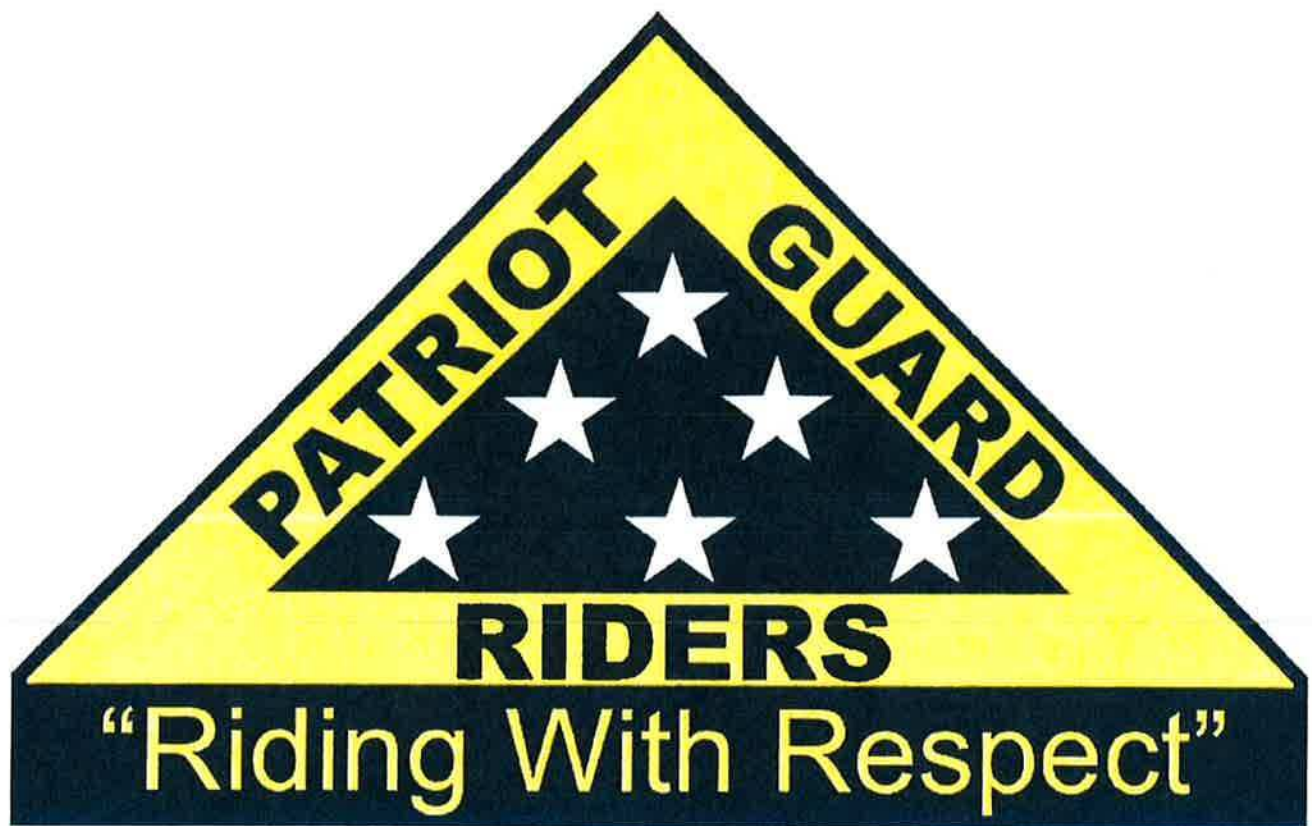
RAM Accounting Date: 11/09/2006

Serial Number: 77040379

Internet Transmission Date: Thu Nov 09 13:14:12 EST 2006

TEAS Stamp: USPTO/FTK-72.250.47.100-2006110913141272

3527-77040379-3507c3ba14ce17d9c93f087827
a0f348e6-CC-1533-20061109113619488470





**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 15

From: Wallin Jason D. [jasonw@geoveritas.com]
Sent: Thursday, November 10, 2006 10:45 PM
To: Jeff Brown
Subject: RE: PGR Ride

Sure that would be great. The other thing that would be helpful I think would be a faq or how to organize one of these that I planned to type up afterwards. I had a chance to talk to the funeral director and it sounds like there intent is to use the wonderful sound of drag pipes to silence the protesters. They have us parking with the pipes facing them.

Jason "waldo" Wallin

-----Original Message-----

From: Jeff Brown [mailto:jeffbrown@valornet.com]
Sent: Thursday, November 10, 2005 9:05 PM
To: Wallin Jason D.
Subject: PGR Ride

Jason,

If you get a few minutes after you return from the ride, I'd sure appreciate a brief report that we can post on the website. Stuff like the number of riders, how law enforcement had us set up in reaction to the demonstrators, responses of the family and community to our presence, any problems or unexpected occurrences, etc. What do you think about adding photos to the website?

No virus found in this incoming message.

Checked by AVG.

Version: 7.5.524 / Virus Database: 269.24.1/1470 - Release Date: 5/28/2008 7:20 AM

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 16

From: Jeff Brown [mailto:jeffbrown@valornet.com]
Sent: Friday, November 11, 2005 5:18 PM
To: Charles Yunker; David Howery; William H. Sloan; Phil Mansker; Tom Connelly; Terry (Darkhorse) Houck; Shawn; Richard Keller; Eric C. Gagomiros; David "Preacher" Slocum; Pete Schulien; Ralph and Susan Ozarkmark; R. L. Oscar Ingram; John & Donna Rohloff; LAnnMullins; Kay Guynes; Keith Calloway; Jason Wallin; Hugh Knaus; Chuck Thompson; Wayne Worthington; David Olsen (STP); Craig Winkler; Everett Freel; Combat Veterans Motorcycle Association; CREGG HANSEN; Harry A. Elliott III; Chuck Antolina; Bill Carr; Perry, Bonnie; Bill Law; Bill Bradley
Subject: PGR was there -Tyler Ryan MacKenzie

Tyler Ryan MacKenzie, 20, of Evans, CO, passed away, Wednesday, November 2, 2005 in Iraq.

Visitation will be from 4:00 to 8:00 p.m., Thursday, November 10, 2005 at Allnutt Funeral Service/Macy Chapel. A funeral service will be at 12:00 p.m., Friday, November 11, 2005 at the Church of Jesus Christ of Latter-day Saints, 501 49th Avenue, Greeley. Interment will be at Sunset Memorial Gardens.

Tyler was born November 7, 1984 in Greeley, CO to David and Julie (Borland) MacKenzie.

He was a lifelong resident of Greeley where he graduated from Greeley West High School in 2003. He joined the United States Army on January 19, 2005

and served with the B Co. 1/502 In. 2 BOT. Fort Campbell. He was an elder in the Church of Jesus Christ of Latter-day Saints.

Tyler was a kind and caring soul, honest and sincere, had the utmost integrity, and was athletic, funny, self-competitive and unselfish. He loved playing videogames, reading, listening to music, playing paintball, animals, volunteering and spending time with his family and friends.

Surviving Tyler are his parents, David and Julie MacKenzie of Evans, CO; sister, Nicole and her husband, Jason Crawford, of Evans, CO; grandparents, Emmett and Mary MacKenzie of Greeley, CO and Ronald and Jenette Borland of Greeley, CO.

Jason Wallin, our Colorado State Captain, headed up our presence there and post these photos and will post a write up later.
<http://www.wallininc.com/pix/listpics.asp?dir=prg>

WBC (World's Biggest Cretins) were there.

Thanks to Jason and all who rode..

Jeff Brown "Twister"
Broken Arrow, OK
Patriot Guard Rider
www.patriotguard.org

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 17

[illegible]

Site Search



Veteran Riders

FIRE
Newsletter

॥ श्रीगणेशाय नमः ॥

THE

SAFETY

Veteran Apparel &
Gear

**Huge Selection of
Quality Veteran
Clothing & Veterans
Accessories.**
militarysearch.usptgear.com

2008 Jeep® Patriot

**Coming Fall 2008.
View Photos Features
Online. Find a Dealer!
www.JeepDealer.com**

American Soldier
Exhibit

Photos honoring our
men and women in
uniform
www.lcfd.org/American

Motorcycle T-Shirts

T-Shirts that make a statement. I've Got The Power.
www.powermotorcyclesu.com

PGR 006920

1 of 8

10/24/2008 10:11 AM

Attention Bikers!

Nobody knows your stompin' grounds like you do, so if you know of any bike night locations, businesses, clubs, rallies and events, or scenic rides and destinations in your area that we don't currently have listed, choose the appropriate form below to submit your information and share with your fellow riders.

[Submit a Bike Night](#)

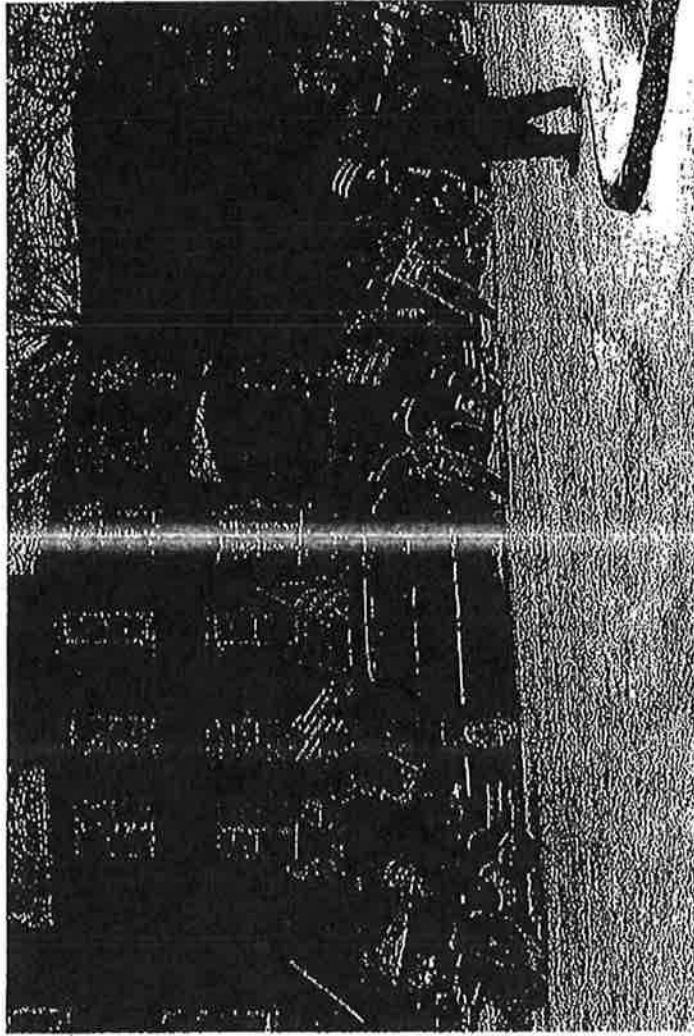
[Submit a Business](#)

[Submit a Rally or Event](#)

[Submit a Scenic Ride or Destination](#)

[Submit a Club or Organization](#)

Patriot Guard Riders



Perception is a strange thing. I have always been amazed at how two individuals can look at the same thing and both see something entirely different. The Patriot Guard Riders group is a fine example. This group was brought to my attention through various posts on the motorcycle forums I visit at www.delphiforums.com. Discussions and recruitment efforts were everywhere, so I had to take a look at the group's website for myself. Before visiting their website I had assumed, with the help of some of the posts I had read, their primary purpose was to ensure the "flakes" of the world did not pollute sacred ceremonies for our nation's fallen heroes. I was wrong. The misperception is this: The Patriot Guard Riders were not formed to be an adversary toward anyone. The amazing fact that is falling through the cracks everywhere is the group's main objective, which is printed clearly in their mission statement. The main objective and focus are to "show our sincere respect for our fallen heroes, their families and their communities."

Patriot
The New Jeep®
Patriot Compact
SUV with Great
Fuel Economy and
Value.
www.jeep.com/Patriot

The Harley
Experience
Visit the Official
H-D Site & See
What The
Experience is all
About!
www.harley-davidson.com

Need Motorcycle
Ins?
Policies as
Customized as
Your Motorcycle.
Get a Free Quote
Here.
www.dairylandcycle.com

Adult Driver
Classes
Chicago area
driver's training
Easy Drop Off &
Pick Up Option
scadriodrivingschools.com

PGR 006921

Their mission is an honorable one, and to see them as anything more than patriots does them a huge disservice. I am as guilty as anyone of assumption. While the Patriot Guard Riders do provide fallen soldiers' families and friends with a buffer from any type of protesters at funeral services, they do this at the request of the family. They are not some kind of vigilante group out to do battle with misguided religious zealots. The group attends services as invited guests of mourning families. They first make the effort to contact the family of a fallen soldier, and at the family's invitation, they attend and serve as "buffers" between the family and disrespectful protesters. They show class and respect to the soldier, his or her family, and their community. I believe their efforts are to show the very best of what this nation is all about.

While many people, including myself, question the use of our military today, one thing has never changed in my mind. The soldiers of our nation are doing their jobs wherever and whenever they are deployed and deserve nothing less than our heartfelt respect, love and admiration. We take for granted the freedoms their sacrifices provide us on a daily basis, but I beg you, NEVER take them for granted. In my mind the Patriot Guard Riders do you and me a service as well. They attend the funerals of our soldiers as representatives of the majority of my family and friends as well as yours, representatives of a grateful nation.

I sincerely request that each and every one of my readers visit www.patriotguard.org and if it is in your heart, join this fine group. If you cannot join but agree with their mission, please pass their message on to others. I want to thank Jeff 'Twister' Brown, National Director of the Patriot Guard Riders, for his time and for sharing information with me for this article.

Jeff also took time out of his busy schedule for the following interview:

CC: What has public opinion been for the Patriot Guard Riders?

Jeff: The public opinion has been overwhelmingly favorable. About the only negative public opinion that I am aware of has come from a protestor. It never ceases to amaze me when we go into some of these towns, especially the small towns, and we have a mission ride. The citizens of the town, they will cross the road and stop and shake our hands and thank us for coming and the response from the family just breaks your heart.

CC: How many active members does the Patriot Guard have?

Jeff: I can tell you exactly how many individual members we have, but bear in mind that we have groups like the American Legion Riders and VFW Riders, Combat Vet Riders, Christian Motorcycle Association and ABATE and all of them ride with us on

PGR 006922

mission rides. If you exclude those individual members, we have 2020 across the country.

CC: I have seen messages in reference to your group on several forums. How is that affecting your recruiting efforts?

Jeff: On an average, we will receive between 75 and 80 new members a day and that has been pretty consistent since I would say about five days after we started.

CC: How are you treated by local law enforcement?

Jeff: One of the first calls we are going to make once we find out about a death is we are going to call local law enforcement, and sometimes their initial reaction can be negative, but it just takes a minute of explaining who we are if they are not familiar with us. If they are familiar with us it is positive, but if they're not familiar with the Patriot Guard Riders, then occasionally you will run into an initial attitude of "biker gangs" and "coming into our town," and we've got protesters there, it's going to be a melee," that kind of thing. But once we explain who we are and that our mission is totally to honor a fallen soldier, then they understand and when the topic of protesters comes up, our attitude is very honestly we are there for a much more noble cause than any protester, and we will ignore the protesters, we will turn our backs to them, we don't have any conversation with them, and we work very, very closely with law enforcement doing exactly what they want us to do. In fact, I have a letter on our website from the chief of police from Inola, Oklahoma where we had a mission ride for Travis Grigg and Chief Brad Craig thanked us for making his job easier. So, we've had a very good relationship with law enforcement, all branches. You'll have state troopers, you'll have sheriffs from the local police, and invariably they will walk through the line of bikers and shake our hands and thank us for coming.

CC: Have you had any negative response from families of those you come to honor?

Jeff: No, you have to understand that before we ever establish a mission ride we will make contact with the family and what their wishes are. If they want a private ceremony and do not want us to come, we don't come, so anytime we set up a mission ride, we are going as invited guests of the family.

CC: How do you decide where to stage a mission?

Jeff: We have emails from the Department of Defense, KIAs (killed in action) and every single one of them is examined and put out on what we call a watch list. We have a state captain and ride captains in every state, and part of their responsibility is to keep an eye on this watch list. If a KIA is posted in their state, then it is their responsibility to contact the local law enforcement, church, funeral home, and the family will be the last. But normally what happens is the family will designate a spokesperson to handle this

PGR 006923

kind of thing, so our calls are to the police, the funeral home and the churches to get the information on how to get a hold of the family contact. Every single KIA is set up on the watch list, and the only reason that a ride would not come from that is if we just absolutely hit a brick wall trying to get a family contact. Or, of the family has requested a private ceremony. We had one mission where we had one sole rider, but that is the rare exception.

CC: Tell us about your first mission?

Jeff: You talk about dramatic! There are pictures of it on our website. I believe it was in Greeley, Colorado, and in fact a local TV station did an interview, and we hadn't been in existence but maybe two days and this one rider rode up there and parked his bike in front of the protesters and I'll tell you what, I'll give him credit, he literally sat there very stoically and make his presence known.

CC: This must be hard for you to put into words, but how do you feel after you have been on a mission?

Jeff: There are a lot of different feelings. A lot of it depends on whether or not you've had any contact with the family. There is a certain amount of pride in knowing that you have done something well and something deserving and something that needed to be done. There is of course, a great deal of sadness over the loss of a young person. And when you do deal directly with the family, it just breaks your heart. I will never forget a mission ride in South Haven, Kansas, a little bitty town. The family had put the word out that any of the riders would be welcomed at the local Methodist Church to have a bite to eat after the services, and I left early in the morning from Broken Arrow, Oklahoma to get to South Haven, Kansas and hadn't eaten, so after the service, I stopped by the church, and I purposely went immediately after the interim, and I grabbed a bowl of soup and right as I was walking out the door, in walked the mother carrying the flag dutched to her chest, and she turned the corner right as I was going out, and she looked at me and threw her arms around me and just wept and said thank you for coming, and I mean that was a long ride back to Oklahoma.

CC: I have one last question for you. I've been hearing this from a lot of our readers and a lot of friends who I have talked to through the forums. What can the average person who is not a rider do to help your organization? Is there anything at all they can do to help you?

Jeff: Absolutely. It is not a requirement that you be a rider to join the Patriot Guard Riders. A non-rider can be just as effective. When you are talking about some of these northern states in the middle of winter when you have two feet of snow and its 30 degrees below, we're not riding motorcycles. We get in the car and drive. So, for someone who doesn't ride, if they feel the same way we do and share our mission

PGR 006924

statement that our main objective is to honor a fallen shoulder. Period. It is not to be a counter protestor; it is not to be a protestor. We are neither of those. We are there to honor a soldier, his family and community. If they share that feeling, join up, get in their car, and meet us at the staging area.

CC: I sincerely request that each and every one of our readers visit www.patriotguard.org and if it is in your heart, join this fine group. If you cannot join but agree with their mission, please pass their message on to others. I want to thank Jeff "Twister" Brown, National Director of the Patriot Guard Riders, for his time-sharing information with me for this article as well as the interview also in this issue.

Article and Interview by [Loney](#) and [Stephanie Wilcoxson](#)

[Printer Friendly Version](#)

Veteran Riders

- [10/1/2008 - CVMA Missouri Chapter 4-2 Support Our Veterans Run - Camdenton, Missouri](#)
- [9/1/2008 - All Patriots Poker Run - Cameron, Missouri](#)
- [8/1/2008 - All Patriots Poker Run - Springfield, Missouri](#)
- [7/1/2008 - 10th Annual Ride for America - Monroe, GA](#)
- [6/1/2008 - Ride to the Walk to Remember-Weston, Missouri](#)
- [3/1/2008 - The Three Amigas - Bikers Serving in Iraq](#)
- [1/1/2008 - Patriot Guard Riders Welcome Home Mission Spc Dalton Howard](#)
- [1/1/2008 - Wreaths Across America Ceremony - Milledgeville, Georgia](#)
- [12/1/2007 - A Soldier's Christmas](#)
- [12/1/2007 - The Patriot Guard Riders Honor Spc. Michael Brown - A True, Real American Hero](#)
- [11/30/2007 - Michael Dean Brown Obituary](#)
- [11/30/2007 - Mission Report](#)
- [9/1/2007 - North Texas Patriot Guard Riders' Meet and Greet](#)
- [7/1/2007 - Defenders M/C Memorial Run - Bushnell, Florida](#)
- [3/1/2007 - Patriot Guard Riders Honor PFC Johnathon Miles Millican - Locust Fork, Alabama](#)

PGR 006925

- [2/1/2007 - Motorcycling Reunites Former Crewmates](#)
- [11/1/2006 - Patriot Guard Riders Honor Pfc. Shane Austin](#)
- [9/1/2006 - Patriot Guard Riders Celebrate Their One-Year Anniversary](#)
- [8/1/2006 - Harley-Davidson 2007 Motorcycles Honor Military Service](#)
- [7/1/2006 - The Moving Wall](#)
- [7/1/2006 - The Silver Lining](#)
- [6/1/2006 - What Memorial Day Means to Me](#)
- [3/1/2006 - Veteran's Tribute Motorcycle](#)
- [2/1/2006 - Final Mission for Sergeant First Class Stephen J. White](#)
- [2/1/2006 - Veteran Riders on the Move](#)
- [1/1/2006 - Patriot Guard Riders](#)
- [12/1/2005 - Lest They Be Forgotten - Memorial Ceremony](#)
- [12/1/2005 - The Veteran Rider](#)
- [11/1/2005 - Kansas American Legion Riders](#)
- [11/1/2005 - The Veteran Rider](#)
- [10/1/2005 - Lest They Be Forgotten, Wisdom-Clary Benefit Ride](#)
- [9/1/2005 - Veteran's Day Letter to Mary, Laura & Sarah](#)
- [8/1/2005 - Escorting The Traveling Vietnam Memorial Wall](#)
- [7/1/2005 - Operation Homecoming USA - A Tribute to Vietnam Vets](#)
- [6/1/2005 - POW - MIA Veteran Riders Motorcycle Club](#)
- [5/1/2005 - A Time to Honor our Military Service Members - Present, Past and Still Missing](#)
- [4/1/2005 - Welcome Home Troops](#)
- [3/1/2005 - Veteran Motorcycle License Plates](#)
- [2/1/2005 - U.S. Angels...Being a Little Bad to do a lot of Good](#)
- [1/1/2005 - Charity is the Act of Selfless Giving](#)
- [12/1/2004 - The Moving Wall™ - A Ride to Remember](#)

PGR 006926

- [11/1/2004 - Fort Riley Open House and Welcome Home for Troops](#)
- [11/1/2004 - American Legion Riders](#)
- [10/1/2004 - New Jersey's Annual Rolling Thunder Ride](#)
- [9/1/2004 - World War II Military Airborne Scooters](#)
- [8/1/2004 - U.S. Army Transportation Corps Soldiers Serving in Iraq](#)
- [8/1/2004 - Army DS3 Provides Advocacy for Severely Disabled Soldiers and Their Families](#)
- [8/1/2004 - Calendar Models Cheer Up Patients, Families at Walter Reed](#)
- [7/1/2004 - Military Veterans Motorcycle Club](#)
- [6/1/2004 - In Country Vets Motorcycle Club](#)
- [5/2/2004 - Combat Veterans Motorcycle Association \(CVMA\)](#)
- [5/1/2004 - May 2004 - A Time of Reflection, Recognition, and Support](#)
- [4/1/2004 - Black Berets Motorcycle Club](#)
- [3/1/2004 - Bikers and Veterans: Cycle Disciples, Kansas City Chapter](#)
- [2/1/2004 - Veteran Motorcycle Riders Web Site Review](#)
- [1/1/2004 - TIME Person of the Year for 2003: The American Soldier](#)
- [12/1/2003 - Christmas at War](#)
- [11/1/2003 - What's so Important about Emporia, Kansas in November?](#)
- [9/29/2003 - Individualism and Imagination: Part I](#)
- [9/15/2003 - Individualism and Imagination: Part II](#)
- [9/1/2003 - Individualism and Imagination: Part III](#)

[Top Of Page](#)

© 2003-2008 CycleConnections.com. All rights reserved.

Web site maintenance by [Fluent Digital Web Site Design](#).

PGR 006927

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 18

From: Olson, David (STP) [David.Olson@guldent.com]
Sent: Thursday, November 10, 2005 8:18 AM
To: jeffbrown@valdnet.com
Subject: Funeral in Hudson, WI

Follow Up Flag: Follow up
Flag Status: Flagged

Jeff,

I got your name from Preacher, who lives in Charlotte, NC and is a member of the C.V.A. He said that you're one of the guys getting things organized for various funerals and he stated that I can contact you to get hooked up on helping to lessen Phelp's impact on funeral proceedings. There's a funeral picket scheduled for tomorrow, November 11, 2005, from 9:30 am - 10:00 am in Hudson, WI at Bethel Lutheran Church for the funeral of Benjamin Smith.

Hudson is about 10 miles from my house. I asked Preacher if any of you fellas are showing up because I'd certainly like to lend a hand/bike/set of exhaust pipes/whatever if I can swing the time off from work. Please contact me at this e-mail address as soon as you can so I can figure out my schedule for tomorrow.

Thanks and I hope to hear from you soon.

Ole
U.S. Army
'88-'92

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 19

Perry, Bonnie

From: Preacher [preacher@carolina.rr.com]
Sent: Friday, November 11, 2006 9:30 PM
To: Jeff Brown; Charles Yunker; David Howery; William H. Sloan; Chuck Antolina; Ben AKA Tha Whispanio; Phil Mansker; Art Van Engen "Moker"; Tom Connelly; Terry (Darkhorse) Houck; Adam Taylor; Shawn; Ken McClellan; Raymond Eade; Richard Keller; Eric C. Gagomiro; Pete Schullen; Ralph and Susan; Ozarkmark; R. L. Oscar Ingram; John & Donna Rohloff; Mark Brubaker; Lannmullins; Kay Guynes; Keith Calloway; John Sprague; Jason Wallin; Hugh Knaus; Chuck Thompson; Wayne Worthington; David Olsen (STP); Craig Winkler; Everett Freel; Combat Veterans Motorcycle Association; CREGG HANSEN; Harry A. Elliott III; Bill Carr; Perry, Bonnie; Bill Law; Bill Bradley
Subject: RE: PGR Mission Statement - Important!

I would suggest one change. "Fallen soldier, the soldier's family and community" would be a better phrase, gender neutral and all. We will be attending the funerals of the female soldiers as well.

Preacher
CVMA #671
<http://www.bastaards.org/Bikes.htm>

-----Original Message-----

From: Jeff Brown [mailto:jeffbrown@valornet.com]
Sent: Friday, November 11, 2006 9:28 PM
To: Charles Yunker; David Howery; William H. Sloan; Ben AKA Tha Whispanio; Phil Mansker; Art Van Engen "Moker"; Tom Connelly; Terry (Darkhorse) Houck; Adam Taylor; Shawn; Ken McClellan; Raymond Eade; Richard Keller; Eric C. Gagomiro; David "Preacher" Slocum; Pete Schullen; Ralph and Susan; Ozarkmark; R. L. Oscar Ingram; John & Donna Rohloff; Mark Brubaker; Lannmullins; Kay Guynes; Keith Calloway; John Sprague; Jason Wallin; Hugh Knaus; Chuck Thompson; Wayne Worthington; David Olsen (STP); Craig Winkler; Everett Freel; Combat Veterans Motorcycle Association; CREGG HANSEN; Harry A. Elliott III; Chuck Antolina; Bill Carr; Bonnie Cutler; Bill Law; Bill Bradley
Subject: PGR Mission Statement - Important!

Hey Folks, I need to know if anyone has any problems with or suggestions for this as our PGR Mission Statement.

Your feedback ASAP would be greatly appreciated. This will be on our website.

Thanks,

Jeff Brown "Twister"

Broken Arrow, OK

Patriot Guard Rider

www.patriotguard.org

Patriot Guard Riders Mission Statement

The Patriot Guard Riders is an amalgamation of riders from across the nation. We have one thing in common besides motorcycles. We have an unwavering respect for those who risk their very lives for America's freedom and security. If you share this respect, please join us.

We don't care what you ride, what your political views are, or whether you're a "hawk" or a "dove". It is not a requirement that you be a veteran.
It

doesn't matter where you're from or what your income is. You don't even have to ride. The only prerequisite is Respect.

Our mission is to attend the funeral services of fallen American military heroes. Each mission we undertake has two basic objectives.

1. Show our sincere respect for our fallen hero, his family, and his community.
2. Protect the mourning family and friends from interruptions created by any protestor or group of protestors.

We accomplish the latter through strictly legal and non-violent means.

No virus found in this incoming message.

Checked by AVG Free Edition.

Version: 7.1.362 / Virus Database: 267.13.0/167 - Release Date: 11/11/2005

No virus found in this outgoing message.

Checked by AVG Free Edition.

Version: 7.1.362 / Virus Database: 267.13.0/167 - Release Date: 11/11/2005

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 20

From: Wallin Jason D. <jasonw@geoveritas.com>
Sent: Friday, November 11, 2005 10:23 PM
To: Jeff Brown <jeffbrown@valornet.com>
Subject: RE: another favor

Done. Hey is there a second that I can take to give you call about a couple of things for the site tomorrow?

Jason Wallin, CISSP
John Deere Agri Services
Fort Collins, CO

970-266-4625
jasonw@geoveritas.com

-----Original Message-----

From: Jeff Brown [mailto:jeffbrown@valornet.com]
Sent: Friday, November 11, 2005 8:48 PM
To: Wallin Jason D.
Subject: another favor

Jason,
I hate to be a pain in the ass, but if you get a minute, could you throw this up on the web page. Please don't be bashful about letting me know if I'm taking advantage.
Thanks,
Jeff

Patriot Guard Riders Mission Statement

The Patriot Guard Riders is an amalgamation of riders from across the nation. We have one thing in common besides motorcycles. We have an unwavering respect for those who risk their very lives for America's freedom and security. If you share this respect, please join us.

We don't care what you ride, what your political views are, or whether you're a "hawk" or a "dove". It is not a requirement that you be a veteran. It doesn't matter where you're from or what your income is. You don't even have to ride. The only prerequisite is Respect.

Our mission is to attend the funeral services of fallen American military heroes. Each mission we undertake has two basic objectives.

1. Show our sincere respect for our fallen heroes, their families, and their communities.
2. Protect the mourning family and friends from interruptions created by any protestor or group of protestors.

We accomplish the latter through strictly legal and non-violent means.

To join the Patriot Guard Riders and be added to the email list for PGR

BROWN008007

mission information, drop a line to:
jeffbrown@valornet.com

No virus found in this incoming message.

Checked by AVG.

Version: 7.5.524 / Virus Database: 269,24.1/1470 - Release Date: 5/28/2008 7:20 AM

BROWN008008

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 71

Perry, Bonnie

From: Jeff Brown [jeffbrown@valornet.com]
Sent: Saturday, November 12, 2005 6:43 AM
To: Charles Yunker; David Howery; William H. Sloan; Ben AKA Tha Whispanic; Phil Mansker; Art Van Engen "Moker"; Tom Connelly; Terry (Darkhorse) Houck; Adam Taylor; Shawn; Ken McClellan; Michael and Kathleen Gestalter; Raymond Eade; Richard Keller; Eric C. Gagomiro; David "Preacher" Slocum; Pete Schullon; Ralph and Susan; Ozarkmark; R. L. Oscar Ingram; John & Donna Rohloff; Mark Brubaker; LAnn Mullins; Kevin Wood; Kay Guynes; Keith Galloway; John Sprague; Jason Wallin; Hugh Knaus; Chuck Thompson; Wayne Worthington; David Olsen (STP); Craig Winkler; Everett Free; Combat Veterans Motorcycle Association; CREGG HANSEN; Harry A. Elliott III; Chuck Antolina; Bill Carr; Perry, Bonnie; Bill Law; Bill Bradley
Subject: Revised PGR Mission Statement

The PGR Mission Statement has met with approval after some modification. The statement was rewritten to be gender neutral. I realize the sacrifice and dedication of our women in service and did not mean to omit them. I appreciate everyone who caught that error and brought it to my attention. The revised mission statement is now up and running on our website. I owe you all an apology for an unintentional oversight on my part.

Sincerely,
Jeff Brown "Twister"
Broken Arrow, OK
Patriot Guard Rider
www.patriotguard.org

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 72

From: Wallin Jason D. [jasonw@geoveritas.com]
Sent: Sunday, November 13, 2005 8:12 AM
To: Jeff Brown
Subject: RE:

Follow Up Flag: Follow up
Flag Status: Flagged

I used to live in that neck of the woods. Let me go to work on my contacts,

Jason Wallin, CISSP
John Deere Agri Services
Fort Collins, CO

970-286-4625

jasonw@geoveritas.com

From: Jeff Brown [mailto:jeffbrown@valnet.com]
Sent: Sunday, November 13, 2005 6:12 AM
To: Wallin Jason D.
Subject: RE: .

I don't think so, I spent several hours last night searching the Internet for Illinois based bike groups and sending out a "mission call" to all of them. Hopefully we'll get some response today.

Jeff

-----Original Message-----

From: Wallin Jason D. [mailto:jasonw@geoveritas.com]
Sent: Sunday, November 13, 2005 12:07 AM
To: Jeff Brown
Subject: RE:

No problem..

Btw do we have anyone near Galesburg, IL for Tuesday?

Jason Wallin, CISSP
John Deere Agri Services

Fort Collins, CO

970-266-4625

jasonw@geoveritas.com

From: Jeff Brown [mailto:jeffbrown@valernet.com]
Sent: Saturday, November 12, 2005 10:10 PM
To: Wallin Jason D.
Subject: RE:

Great...have a good night. I made the email change

Thanks,

Jeff

-----Original Message-----

From: Wallin Jason D. [mailto:jasonw@geoveritas.com]
Sent: Saturday, November 12, 2005 10:43 PM
To: Jeff Brown
Cc: Jason D. Wallin
Subject: RE:

Hey Jeff I am getting close to caught up it must be a busy day for you...

I will throw up a counter later tonight as I get going up on the site.

Also just for ease and not pissing my boss off we should probly start using Jason@wallininc.com as my email address.

Jason Wallin, CIBSP
John Deere Agri Services
Fort Collins, CO

970-266-4625

jasonw@geoveritas.com

From: Jeff Brown [mailto:jeffbrown@valornet.com]
Sent: Saturday, November 12, 2005 9:31 PM
To: Wallin Jason D.
Subject:

No virus found in this incoming message.

Checked by AVG.

Version: 7.5.524 / Virus Database: 269.23.16/1432 - Release Date: 5/14/2008 7:49 AM

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 23

Perry, Bonnie

From: Jeff Brown [jeffbrown@valornet.com]
Sent: Tuesday, November 15, 2005 10:08 AM
To: Keith Calloway; Harry A. Elliott III; CREGG HANSEN; Gregg Hansen "Ebay"; Terry (Darkhorse) Houck; David "Preacher" Stocum; Chuck Antolina; Perry, Bonnie; Eric O. Gagoimiro; Jasonw@geoveritas.com
Subject: State Captain Photos

Hey Folks,

Our webmasters, Jason "Waldo" Wallin and Hugh Knaus, have been burning the midnight oil on our new web site. I've seen the preliminary and it will blow you away!!!

Anyway, I need each of you to email me a photograph of you to post on the new site. As a state captain, our members need to be able to put a face with your name and to know who to look for when they join a mission ride.

Thanks,
Jeff Brown "Twister"
Broken Arrow, OK
Patriot Guard Rider
www.patriotguard.org

IN THE UNITED STATES
PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

JEFF BROWN,

Opposer,

vs.

Opposition
No. 91181448

PATRIOT GUARD RIDERS, INC.,

Applicant.

The deposition of KURT ALLEN MAYER, taken
in the above-entitled cause, before SUZANNE
THALJI, Certified Shorthand Reporter of the
State of Illinois, on August 2, 2011, at
150 North Michigan Avenue, Suite 2700, Chicago,
Illinois, pursuant to notice, commencing at
9:29 a.m.

REPORTED BY: SUZANNE THALJI, CSR, RMR, CRR
LICENSE NO.: 084-002337
JOB NO.: 168211A

1 APPEARANCES:

2 McAfee & Taft, by
3 MS. JENNA PERRY
4 1717 South Boulder Avenue, Suite 900
5 Tulsa, Oklahoma 74119
6 (918) 587-0000
7 jenna.perry@mcafeetaft.com

8 Representing the Opposer;

9 CLARK HILL PLC, by
10 MR. JAMES A. O'MALLEY
11 MR. DAVID J. MARR
12 150 North Michigan Avenue, Suite 2700
13 Chicago, Illinois 60601
14 (312) 985-5562
15 (312) 985-5558
16 jomalley@clarkhill.com
17 dmarr@clarkhill.com

18 Representing the Applicant.

19 ALSO PRESENT:

20 MR. WILLIAM HAROLD RICHART II
21
22
23
24

1 I N D E X

2 WITNESS

3 KURT ALLEN MAYER

4 EXAMINED BY PAGE

5 MR. O'MALLEY 5, 81

6 MS. PERRY 71

7 APPLICANT'S EXHIBITS

8 NUMBER DESCRIPTION PAGE

9 Exhibit 24 Patriot Guard Riders Forum, 22
10 dated 12/4/05, 12/14/05,
2/25/06, PGR 006714-1611 Exhibit 25 Patriot Guard Riders Home 26
12 Page, 12/28/05, PGR 000091-9413 Exhibit 26 Patriot Guard Riders Home 29
14 Page, 12/30/05, PGR 000095-9815 Exhibit 27 Patriot Guard Riders Home 30
16 Page, 1/10/06, PGR 000099-10317 Exhibit 28 Patriot Guard Riders Home 30
18 Page, 4/8/06, PGR 000104-11219 Exhibit 29 Patriot Guard Riders Home 40
20 Page, 4/15/06, PGR 000113-11821 Exhibit 30 Patriot Guard Riders Forum, 44
22 11/25/08, PGR 0006781-8323 Exhibit 31 Patriot Guard Riders Forum, 48
24 1/8/06, 1/9/06, PGR 0006861Exhibit 32 Patriot Guard Riders Forum, 50
11/25/08, PGR 0006864-78Exhibit 33 Emails dated 2/24/06, 57
PGR 002232

1	APPLICANT'S EXHIBITS		
2	NUMBER	DESCRIPTION	PAGE
3	Exhibit 34	5/11/06 email from Brown to dsj30c@yahoo.com and Execs, BROWN007994	64
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			

1 KURT ALLEN MAYER,
2 having been first duly sworn, was examined and
3 testified as follows:

4 DIRECT EXAMINATION

5 BY MR. O'MALLEY:

6 Q. Kurt, you have had your deposition
7 taken before; is that correct?

8 A. That's correct.

9 Q. Okay. So you know how a deposition
10 works?

11 A. Yes.

12 Q. I just have to give you quick reminders
13 here despite that. I am going to ask you a
14 bunch of questions relating to this trademark
15 opposition. You will have to answer them under
16 oath.

17 The other lawyer here, Jenna Perry,
18 will also be allowed to ask you questions too if
19 she so chooses at the end of our discussion.

20 A. Okay.

21 Q. The court reporter is taking everything
22 down and will prepare a written record of
23 everything that's said, which is referred to as
24 a transcript. If you want to, you can review

1 the transcript to check if it's accurate, make
2 any corrections before signing it. Do you
3 understand that?

4 A. Very good. I do.

5 Q. It is very important that you
6 understand the questions and give accurate
7 answers. If there is anything that you don't
8 understand or anything that you don't know or
9 aren't sure of, you let us know, okay?

10 A. Very good.

11 Q. Please be sure to verbalize your
12 answers to make it easier for the court reporter
13 to understand you. Don't nod or shrug or
14 whatnot.

15 Are you feeling good this morning?

16 A. I am.

17 Q. Any medication that would impact your
18 ability to get through this deposition?

19 A. No, sir.

20 Q. Okay. Let's get started. Can you
21 state your full legal name for me?

22 A. Kurt Allen Mayer.

23 Q. And where do you live?

24 A. I live in Houston, Texas.

1 Q. And what do you do for a living?

2 A. I am a software analyst. I work for an
3 oil company, Noble Energy, and prepare reporting
4 for our executive team.

5 Q. Okay. What is your educational
6 background?

7 A. Some college.

8 Q. Okay. And were you ever in the
9 military?

10 A. I was not.

11 Q. Okay. Do you go by any other names,
12 nicknames?

13 A. VenturaCowboy.

14 Q. Is that your road name or ride name?

15 A. It's a ride name, a road name, right.

16 Q. How did you first become -- strike
17 that.

18 How did you first hear about the PGR?

19 A. It was through a newspaper article that
20 I read online. I am sort of a news hound, and I
21 ran across this article that described a,
22 quote/unquote, church protesting at a soldier's
23 funeral. And it just outraged me when I read
24 about it, and there was a one line mention in

1 there of an organization that felt the same way,
2 and so I did a little search, found a website
3 and got in contact with the folks there.
4 Somebody -- Jason Wallin answered back to me,
5 and I told him I wanted to help.

6 Q. Okay. What time period are we talking
7 about here?

8 A. This is right at the tail end of
9 November 2005.

10 Q. Okay. And so when you said you wanted
11 to help, what did you start doing to help?

12 A. I have a background in web design and
13 programming, and I also at the time was working
14 in public relations, investor relations
15 technically for a corporation, and so I thought
16 that I could help get the word out, and if he
17 didn't have enough help doing this web page that
18 they were trying to put together, this website,
19 I volunteered to at least be the backup guy or
20 do some programming.

21 Q. Okay. And then so tell me about the
22 types of things that you then did while you were
23 with the PGR.

24 A. I think I formally joined through the

1 website. It was either December 4 or
2 December 5 and got in -- was contacted right
3 away by what they call a state captain, Texas
4 state captain, which was Bonnie. Her name was
5 Cutler at the time. I am thinking of her today
6 as Bonnie Perry. And she asked if I would help
7 lead a ride on one of these funeral missions,
8 and I said I would be happy to do that. So I
9 met up with her. The five of us did one of the
10 very first missions in Texas, in that part of
11 Texas, Houston, and just thought it was really
12 cool.

13 I started beelining for the reporters
14 and the television crews that were there to
15 explain who we were because that's just kind of
16 how I am on the PR side, and she picked up on
17 that, called -- I think she called Jeff or Jason
18 and suggested to me that maybe I should help
19 them with the PR.

20 Q. Okay.

21 A. So that became my role from that point
22 on. I got into contact with -- I believe it was
23 Jeff first. Jason put me in touch with Jeff,
24 and I said I think I could really contribute in

1 the area of press releases and public relations.
2 So that became an official role for me, and then
3 I was invited to be one of the three directors
4 of the -- we were trying to form a nonprofit at
5 the time.

6 Q. Okay. And when did that occur?

7 A. That was within weeks of when I joined,
8 December 10, 11, 15, somewhere in that period in
9 there. It really started moving really fast. I
10 had only had time to go on that first mission,
11 and then we were already talking about me
12 helping at a nationwide level.

13 Q. Sure.

14 A. More than just the website stuff
15 really.

16 Q. Sure. So did you then have some kind
17 of a title that was either designated or --

18 A. Yes, national press director.

19 Q. National press director, okay. So I
20 will kind of take you through that. As national
21 press director, what types of things did you do
22 on behalf of the PGR?

23 A. Sent out hundreds and thousands of
24 press releases to regional television, radio,

1 and newspaper outlets depending on where I knew
2 we were going to have a mission and I would
3 just -- not really flood, but I would just make
4 sure those people were informed in the media
5 that we were doing this, invite them to come
6 check it out, to cover it, that it would be a
7 public interest and special interest I thought
8 in particular and wrote a lot of -- wrote a lot
9 of things on the website, just trying to get the
10 word out explaining what we were and how to
11 pitch that message, if you will, because I knew
12 I wouldn't be the only person explaining who the
13 PGR was.

14 Q. Okay. Were you ever involved in like
15 television programs, radio shows?

16 A. Yes, yes, hundreds. Good Morning
17 America, Hannity & Colmes. Boy, they just all
18 blend together. Larry King, BBC, a couple of
19 Russian papers I can't even pronounce.
20 Interviews just came really wild and fast.

21 I helped the Associated Press put a
22 story together that really caused an explosion
23 back in -- we started working on it in February,
24 and I believe the story broke the first week of

1 March, and I remember on that day I had 180
2 voicemails come in from around the world asking
3 for interviews. I learned at that time when
4 email comes in too fast on Outlook, it stops
5 doing a little popup telling you who is sending
6 email and just says you have mail.

7 Q. Okay.

8 A. They were coming in at about -- I was
9 getting about a thousand emails an hour at that
10 time.

11 Q. That's a lot to keep up with.

12 A. Yeah. I never read them all.

13 Q. Okay. So about that time when this
14 explosion took place, could you describe kind of
15 your normal day for me, if there was a normal
16 day?

17 A. In February in particular, going into
18 March, it really bordered on the surreal. I was
19 working -- we work eight-, nine-hour days at
20 work, and it's typically between seven and five
21 o'clock during the day, and I was getting all
22 these requests for interviews, newspaper,
23 magazine, Time Magazine, just television, and so
24 I had to really just schedule it.

1 So I would just close my door at
2 lunchtime, let my boss know I am going to be
3 doing a radio interview, so I tried to schedule
4 all my radio interviews then, and then I would
5 do drive time radio shows on the way to work
6 while I was driving to work. So they would
7 interview me in Detroit. I did a lot of shows
8 here in Chicago actually, drive time morning
9 shows. So I thought it was kind of funny that I
10 was in my car doing drive time shows. I did the
11 same thing on the way home.

12 I'd have dinner with the family and
13 then in the evenings shift to the other side of
14 the world and start doing interviews for BBC,
15 China, Russia, Japan.

16 Q. Okay. And then --

17 A. That was my every day, Saturdays,
18 Sundays.

19 Q. Now, how did that affect your work
20 life?

21 A. Work was okay.

22 MS. PERRY: Objection, irrelevant.

23 MR. O'MALLEY: You can answer.

24 A. I went to my CEO and explained what was

1 going on, and so I had backing with my company,
2 but it impacted my work. I think they just --
3 they felt what we were doing is pretty cool, and
4 I think they just kind of tolerated it for a
5 while.

6 Q. Okay. Then how did it affect your
7 personal life?

8 A. Nearly lost my marriage --

9 MS. PERRY: Objection again, irrelevant.

10 MR. O'MALLEY: You can answer.

11 A. Nearly lost my marriage because of the
12 amount of time I was dedicating to this
13 organization, keeping me from family.

14 Q. Okay. During this time you are
15 answering a lot of questions from interviewers
16 or whatnot. Did you ever go back and talk to
17 Jason and/or Jeff about the beginnings of the
18 PGR and ask questions about PGR so that you were
19 knowledgeable to answer any and all questions
20 that would come your way?

21 A. Yes.

22 MS. PERRY: Objection, leading. Please
23 rephrase the question.

24 BY MR. O'MALLEY:

1 Q. Did you ever talk with Jeff and Jason
2 about the beginnings of the PGR?

3 A. Of course.

4 Q. Why did you do that?

5 A. And I did that for the reason that I
6 wanted to be comfortable with explaining our
7 history.

8 Q. Okay. Did you ever talk to them about
9 the PGR store?

10 A. Yes. The first exposure I had to a
11 store is I had asked -- I had asked Jeff if I
12 could have some kind of a pin or a hat or
13 something like that, if there's something I
14 could use to identify myself as a Patriot Guard
15 Rider because I am going in front of these news
16 crews.

17 And so he sent me a small packet in the
18 mail that was labeled PGR store and the return
19 address and had some -- our tri-cornered pins in
20 it. And then I got a maroon hat that had the
21 tri-cornered logo on the front of it to help
22 identify who I was when I went on interviews on
23 camera, and that was in December.

24 Q. That was in December of '05?

1 A. December '05. And the pins in
2 particular he was really happy with because he
3 said he had just gotten those in.

4 Q. Jeff had just gotten those?

5 A. Jeff had just gotten those in, yes.

6 Q. Okay. What knowledge, if any, did you
7 have about the operation of the store?

8 A. My understanding of the store was that
9 we were using the store -- because people wanted
10 things to identify with the Patriot Guard
11 Riders, very, very proud membership, and so they
12 were -- they wanted to purchase things.

13 And my understanding is these things
14 had cost. We couldn't just give them away, and
15 we needed to cover the cost that -- if there was
16 a modest increase over cost, that we could use
17 that money as money to offset costs of doing the
18 organization. There was discussion sometimes of
19 things like maybe we could use it to pay for
20 people's gas, I mean to do these missions, that
21 there was cost for flags. There's cost for
22 other things, flyers and pamphlets.

23 I mean I was printing out thousands of
24 these pamphlets through another guy in Houston,

1 and so we didn't want people to have to pay for
2 these things out of pocket. So my understanding
3 was this money was coming from the revenue from
4 the store to offset any costs we had to
5 publicize this organization.

6 Q. Did you ever have out-of-pocket
7 expenses?

8 A. I did.

9 Q. And what did you do with those
10 out-of-pocket expenses?

11 A. I filed expense reports, and I was
12 reimbursed for it.

13 Q. From who?

14 A. From Jason. He was our treasurer.

15 Q. Okay.

16 A. And he would reimburse me for that.

17 Q. Okay. As a part of your talks with the
18 media, with anybody really, with Jeff, with
19 Jason, did there ever come any discussion with
20 regard to who owned the Patriot Guard Rider
21 marks or the logo?

22 A. Yes.

23 Q. Can you explain these conversations and
24 who they were with?

1 A. I want to say they were exclusively
2 with Jeff. Jeff and I would discover places on
3 the Internet where people were borrowing our
4 logo, if you will. We would -- you know, they
5 were doing it for the best intentions. They
6 wanted to promote us and help us and click here
7 on this link, and no one ever wants to just put
8 a link. They like to have little pictures.

9 So they would take our -- either our
10 banner with our slogan, or they would take the
11 tri-colored -- the tri-cornered logo and they
12 would put it on there as a link so you can click
13 here and it would take you to the Patriot Guard
14 Riders website. And that in particular bothered
15 Jeff to no end, and so I would help him ask
16 people to take that logo in particular off the
17 website.

18 Q. Okay.

19 A. And what we would explain to people and
20 what Jeff explained to me is that we need to be
21 in control as an organization of where that
22 emblem or any of our banners that would identify
23 us as an organization, where that appears,
24 because we really don't know anything about that

1 organization and we need to protect our
2 reputation and what we stand for and what we're
3 doing. So we needed to not just let that go out
4 in the wild.

5 Q. Okay. And so these discussions that
6 you had with Jeff, were they while you were
7 pertaining to working on PGR business or
8 activities?

9 A. Oh --

10 MS. PERRY: Objection, vague.

11 MR. O'MALLEY: You can answer.

12 A. Absolutely. In the course of what I
13 did, I used -- you know, I used our own image
14 library to put together the materials that I
15 published to the media and put out at biker
16 stores and trifold material like that. You
17 know, I used those materials all the time.

18 Q. Okay.

19 A. Was that the question? I'm sorry.

20 MR. O'MALLEY: I'll be honest. I forgot what
21 the question is at the moment. If you could
22 read it back for me, please.

23 (Question read.)

24 BY MR. O'MALLEY:

1 Q. Okay. Let me rephrase that here. The
2 discussions that you had with Jeff, did they
3 occur while you were discussing PGR business?

4 A. Yes, yeah.

5 Q. And when you said that you also went
6 out and contacted some of these groups or
7 whatnot, how did you find out about them first
8 of all?

9 MS. PERRY: Objection, vague. Can you
10 rephrase, please?

11 MR. O'MALLEY: Sure.

12 Q. You said at some point in time there
13 were, you know, people that were using the marks
14 or the name, and they would provide, for
15 instance, links on websites. How did you come
16 to find out about these?

17 A. I would stumble upon them. Part of
18 what I consider my position to be as the public
19 relations director, as the press director, was
20 to look for stories about us, either ones that I
21 had initiated or attempted to get to happen or
22 things that just got picked up on by the media.

23 So part of my daily routine was to
24 troll through for news, and I had several

1 programs that would also go out and do automated
2 searches. And so I would review these to see
3 who was writing about us, see if I needed to go
4 correct some information that somebody had, to
5 ask for a correction to the story.

6 And what would pop up often in those
7 searches would be someone's website that would
8 be referring to the Patriot Guard Rider, and
9 it's not a news website. So I would go look and
10 that's where I would find the -- somebody, you
11 know, right click downloaded our logo and
12 incorporated it in their website.

13 Again, it was almost always with the
14 best intentions. There were a couple people
15 that I had to address that were trying to
16 commercially benefit from this. I mean there
17 was -- one memorable event is Jeff and I had to
18 contact a marina, boat marina owner out in
19 California because he had come up with some kind
20 of a flag stand you could mount to your boat and
21 put a Patriot Guard Rider flag on, and it had
22 that picture of our Patriot Guard Rider flag
23 with the logo mounted on this device that he had
24 come up with. And we just didn't think that

1 that was right in that case that he should
2 commercially benefit from his design using our
3 flag as the example.

4 Q. Okay. And so you were involved in
5 these discussions --

6 A. Yes.

7 Q. -- with the third parties?

8 A. Jeff and I would talk about them
9 beforehand, and then we would talk either
10 separately, in a few cases together, with the
11 third parties.

12 Q. Okay. So at times you did this on your
13 own without Jeff involved?

14 A. Without Jeff involved.

15 Q. Okay.

16 A. And I always let him know what I found
17 and where so he knew. Hey, I'm going to go tell
18 these people to cease and desist on that.

19 MR. O'MALLEY: Okay. I am going to get into
20 a few documents here.

21 (Applicant's Exhibit 24 was
22 marked for identification.)

23 BY MR. O'MALLEY:

24 Q. Okay. This is Applicant's Exhibit

1 No. 24, which was produced by PGR and is
2 identified as PGR 006714 through PGR 006716. If
3 you go to the first page, there is a forum
4 posting dated December 4, 2005, which was by
5 Twister. Who is Twister?

6 A. Twister is Jeff Brown.

7 Q. Okay. And this is titled -- it says --
8 he is writing to somebody. It says "eabker...I
9 remembered." I don't know what that means, but
10 then starts "Press Release." It says, "National
11 Network of Bikers Honor Fallen Soldiers While
12 Shielding Mourners From Protestors."

13 Have you ever seen this forum posting
14 before?

15 A. I did. This was the day -- either the
16 day I joined or the day before I joined, and I
17 saw this. That's what started getting my mind
18 wrapped around these guys needed help writing
19 press releases.

20 Q. Okay. If you turn to the second page
21 and then to the third page, on the second page
22 right at the bottom, there is -- the only thing
23 you can see is VenturaCowboy.

24 A. Yes, sir.

1 Q. Is that what you said you were known
2 as?

3 A. Yes, sir.

4 Q. So this is your posting then?

5 A. It is my posting, yes.

6 Q. Okay. And so you responded what
7 appears to be about ten days later on
8 December 14?

9 A. Okay.

10 Q. Can you read to me what you said there?

11 A. Yes. "Jeff, why don't we edit the
12 above post and replace the text with a link to
13 the press release file. That way it always
14 stays 'fresh' and won't contain errors such as
15 the one above has (like
16 jbrown@patriotguard.com." He put the wrong
17 email address in. "Oops, that won't work) that
18 may also continue to propagate if someone does a
19 'cut 'n paste.'"

20 Q. Okay. So what was your intention
21 behind this post?

22 A. Well, I was already acting at this
23 point in the capacity of public relations
24 director and was concerned that if we were going

1 to go put statements like this in forum
2 postings, that at some point it is going to be
3 impossible to keep track of these things. So I
4 wanted it in one central place so that if we
5 ever tweaked the statement or the press release,
6 that it could just be referred to through web
7 technology. So anywhere you had that link, it
8 would always point to the same central file, if
9 you will.

10 Q. Okay. Was your suggestion taken to
11 heart, I guess, or implemented?

12 A. Yes, absolutely.

13 Q. Okay. I just wanted to point out here,
14 in your signature line, can you read to me what
15 it says there?

16 A. Yes, I can. And I would like to offer
17 explanation too when I read it. It says "Kurt
18 'VenturaCowboy' Mayer, Public Relations,
19 National Director (Retired), Patriot Guard
20 Riders, KD5FZV." That's my ham radio call sign,
21 and "It ain't whatcha do but the way whatcha do
22 it!"

23 Q. Okay. So in there it says retired?

24 A. Correct.

1 Q. The --

2 A. So the way the website works -- I'm
3 sorry to interrupt.

4 Q. That's all right. Go ahead.

5 A. The way these websites work when you do
6 a signature like that, it picks it up from a
7 centrally located file, and anywhere you have
8 made a posting, when you change that signature,
9 if you will -- it's just a link pointing back to
10 a file. So when you change that file, wherever
11 you did a posting, wherever in the website,
12 regardless if you did it a year ago, two years
13 ago, it changes right then. So what this tells
14 me when I read this is that you've captured this
15 post here at a point where I had already retired
16 as national director, and I would have changed
17 my signature line at that time.

18 (Applicant's Exhibit 25 was
19 marked for identification.)

20 BY MR. O'MALLEY:

21 Q. Okay. Thank you. This is Applicant's
22 Exhibit No. 25, which is identified as
23 PGR 000091 through PGR 000094. Do you recognize
24 this document?

1 A. I'm afraid I don't understand the
2 question.

3 Q. Do you know what this document is?

4 A. Yes. It's a printout of the home page
5 of our website at a particular date.

6 Q. Okay. And it identifies the date on
7 the top left of the first page as Wednesday,
8 December 28, 2005?

9 A. Correct.

10 Q. Is this to your knowledge how the
11 website appeared as of Wednesday, December 28,
12 2005?

13 A. Yes.

14 Q. Okay. Can you turn to the second page
15 in the bottom there. Right above where it says
16 "Thanks for your support!" can you read to me
17 the one line that is stated there?

18 A. Yes. "If you'd like to support the PGR
19 and our missions further, click on the Paid Ads
20 frequently and purchase items you want from the
21 PGR Store."

22 Q. What does that statement mean to you?

23 A. We had recently put up advertising on
24 the website as another means of getting some

1 revenue to offset our costs. The intention was,
2 the way I understood it, was the paid ads were
3 going to help offset the technical computing,
4 web hosting side of things, and the PGR store
5 was going to be a stream of revenue that was
6 going to help offset costs of operating the
7 organization.

8 So what this means to me here is that
9 we were inviting people to support the
10 organization by examining ads, and that's a
11 revenue stream. When you click on an ad on a
12 website, it typically generates revenue for the
13 originating click. So if they go look at things
14 on other websites, other businesses, that
15 generates money for that organization, in this
16 case Patriot Guard Riders.

17 The store was to let people buy
18 memorabilia or supportive gear and through doing
19 that with the knowledge that any extra money
20 over the cost of these items then would help
21 support the Patriot Guard Riders.

22 Q. Okay.

23 A. That was our purpose in putting that on
24 there.

1 (Applicant's Exhibit 26 was
2 marked for identification.)

3 BY MR. O'MALLEY:

4 Q. Okay. Thank you. This is Applicant
5 Exhibit No. 26, which was produced by PGR,
6 identified as PGR 000095 through PGR 000098.
7 This document is similar to the last document we
8 just looked at.

9 A. Yes.

10 Q. Do you see any differences between
11 them?

12 A. Nothing immediately jumps out at me.

13 Q. Okay. If you turn to the first pages
14 and look at the top left corner at the dates,
15 are they the same dates?

16 A. They are not the same dates. Sorry.
17 Yes.

18 Q. What is the date of this one?

19 A. This one is December 30, 2005.

20 Q. Okay. So two days later than the first
21 one, right?

22 A. Correct.

23 Q. And does it have that same statement at
24 the bottom of the second page that we have

1 previously discussed?

2 A. Yes.

3 (Applicant's Exhibit 27 was
4 marked for identification.)

5 BY MR. O'MALLEY:

6 Q. This is Applicant's Exhibit No. 27
7 which was produced by PGR, identified as
8 PGR 000099 through PGR 000103. This document,
9 can you tell me the date that's in the top
10 left-hand corner?

11 A. Yes. It reads Tuesday, January 10,
12 2006.

13 Q. And what is this document?

14 A. This is also a printout of the home
15 page, the top page of the hierarchy of the
16 website, patriotguard.org.

17 Q. Okay. And if you would turn to the
18 third page, do you see the same statement that
19 we have discussed with regard to Applicant's
20 Exhibit No. 25 and 26?

21 A. Yes, I do.

22 (Applicant's Exhibit 28 was
23 marked for identification.)

24 BY MR. O'MALLEY:

1 Q. Okay. This is Applicant's Exhibit
2 No. 28, produced by PGR and identified as
3 PGR 000104 through PGR 000112. This document
4 has a date on the top left that says Saturday,
5 April 8, 2006?

6 A. Yes.

7 Q. Can you tell me what this document is?

8 A. This is again a printout of the home or
9 top page of the hierarchy of the website
10 patriotguard.org.

11 Q. Okay. Can you turn to what is
12 identified as PGR 000107?

13 A. Yes, sir.

14 Q. And what is the last sentence on that
15 page?

16 A. It's the same sentence that we had
17 on -- the same text. "If you'd like to support
18 the PGR and our missions further, click on the
19 Paid Ads frequently and purchase items you want
20 from the PGR Store."

21 Q. Okay. Thank you. Can you turn back to
22 the first page of this document?

23 A. Yes, sir.

24 Q. And there's a spot towards the bottom

1 that says, "The new Online PGR Store is now up
2 and running." And I will just read the rest
3 here. It says, "If you click on the PGR Store
4 link from the web site, it should take you
5 there, or you can go there directly at
6 www.patriotguardstore.org."

7 A. Yes, sir, I see that.

8 Q. What is the new online PGR store? What
9 does that mean?

10 A. We had -- this is April 8, 2006, and
11 just weeks before we had had this massive
12 explosion in our membership, meaning that people
13 were coming in droves to join the organization
14 through this website. We also had thousands and
15 thousands of media outlets going to the website
16 over the course of a week. It was almost daily,
17 multiple times daily, bringing our entire
18 website down and making it unavailable.

19 Missions, critical, the main purpose of
20 the website on the home page is to let people
21 know where they can go attend a mission, so that
22 was bad to have the website down. We felt that
23 part of it -- at least I was told by Jason that
24 part of the reason was because of store traffic

1 as well. So there was discussions with Jeff and
2 myself and Jason to split it into two websites,
3 and that would be easier to maintain, and then
4 we wouldn't have as much risk of the website
5 going down.

6 So Jason began that process of doing
7 this patriotguardstore.org, which my
8 understanding was just a different domain name.
9 It was going to point to another server that was
10 running in Jason's basement, still in the same
11 context of our servers but a way to segregate
12 the traffic, if you will, so not all of it was
13 trying to get funneled to the same server.

14 Q. If somebody wanted to purchase
15 something from the PGR store prior to this new
16 online PGR store going on, how would they go
17 about doing that?

18 A. We have a navigation box on the
19 left-hand side of the website, the home page.
20 Actually, I believe that that navigation box
21 appeared on every page, but commonly you would
22 see it on the top page. And one of the
23 navigation links -- the purpose of the
24 navigation box is to take you to different areas

1 of the website. One of the links is PGR store.
2 So they would click on that link from our home
3 page for the organization, and it would take
4 them to our store, which was just really just
5 another set of pages within the website.

6 And so this mechanism here, they still
7 continued to click on the link PGR store and it
8 redirected them to another web server, if you
9 will, that hosted those web pages. So that's
10 how the segregation mechanism was achieved.

11 Q. Okay.

12 A. Still navigated from the same place,
13 and it was transparent to our membership of how
14 they were actually getting to this other
15 location.

16 Q. Okay. Now, when this occurred, had
17 PGR, Patriot Guard Riders, Inc., been formed
18 prior to this time?

19 A. I believe so.

20 Q. And what involvement did you have in
21 PGR, Inc.?

22 A. I was the secretary. I was one of the
23 officers of the corporation, so assigned officer
24 and founding secretary of the organization.

1 Q. Okay. And who were the other people
2 that were --

3 A. There were three officers, myself,
4 Jason Wallin, who was treasurer, and Jeff who
5 was president.

6 Q. And as part of this, did you have
7 meetings or telephone conferences? How would
8 you communicate with one another regarding PGR
9 business?

10 A. Some through email informally. We just
11 never got to the point where we would have
12 organized scheduled weekly meetings between the
13 three of us, but usually some issue would come
14 up, and we would need to talk. So the three of
15 us would get on a conference call together.
16 Jason had the ability to set up conference
17 calls, and he would give us a number, and we
18 would call in.

19 So the three of us would talk at first,
20 and then we realized that we needed more people
21 to get involved. So that's when we discussed
22 the idea of forming a board of directors, which
23 is really just an executive team that we could
24 start shedding some of this stuff off. We were

1 so overloaded, so overwhelmed.

2 Q. Okay. Now, you had said you had
3 conversations or communications with Jeff and
4 Jason after this explosion on your website, that
5 this was the reason for switching the store?

6 MS. PERRY: Objection, leading.

7 A. There were discussions --

8 MS. PERRY: I think he will have to rephrase
9 that.

10 MR. O'MALLEY: Yes. I'm sorry.

11 Q. Can you tell me again why did
12 www.patriotguardstore.org come to be?

13 A. It was explained to me by Jason that we
14 needed to -- it is called load leveling. We
15 needed to load level the traffic going into
16 Patriot Guard Riders' website, and so he said
17 one way to do that is essentially we are going
18 to create two websites so some of the traffic
19 going through would be -- it is called
20 redirecting, would be redirected to this other
21 website, this other domain, this other URL, the
22 patriotguardstore.org.

23 Q. Okay. When did these conversations or
24 communications with Jason take place?

1 A. We started talking about the need --
2 having the need for it in February and I --
3 probably late February and I didn't -- I didn't
4 really see the need for it, but then in March
5 when we just started bringing the website down
6 because of the traffic, then I was like, okay, I
7 can see. We need to do this.

8 Q. Okay. Was Jeff involved in any of
9 these conversations?

10 A. I don't recall him being directly
11 involved in those. I do remember Jason saying
12 that Jeff was okay with it.

13 Q. Okay.

14 A. He didn't really understand it, but he
15 was okay with it.

16 Q. Okay. The top level domain, the
17 dot-org that is at the end of the organization's
18 website, www.patriotguard.org and here on the
19 PGR store, the new online PGR store is
20 patriotguardstore.org, what does dot-org mean to
21 you?

22 A. They're a governing organization in --
23 in the world really that determines what type of
24 web extension would be appropriate for different

1 types of users or uses of the Internet. Dot-org
2 is for an organization. You see things like
3 dot-net, meaning typically that it's an Internet
4 provider, dot-com for a commercial organization.
5 So when I see dot-org, I think of an
6 organization of people.

7 Q. Okay. Just scrolling to the second
8 page, PGR 00105 here, there's more discussion
9 relating to the headline, "The new Online PGR
10 Store is now up and running." Who signed this
11 document?

12 A. Are you asking who initiated this
13 particular domain?

14 Q. No. I apologize. It says here,
15 "Thanks again for all your support, patience and
16 understanding.

17 "Sincerely, PGR Store."

18 Who is PGR store?

19 MS. PERRY: Objection, calls for speculation.

20 MR. O'MALLEY: If you know, you can answer.

21 A. I need a moment to recall. I don't
22 recall why that was worded that way.

23 Q. Okay. Can we scroll down here just a
24 little bit. Right underneath "PGR Store" it

1 says "Media News Flash: ABC's Good Morning
2 America did a very special story on a recent
3 mission to honor Sgt. Gordon F. Misner, II in
4 Colorado Springs, CO. It aired this Monday
5 morning -- March 20th -- as part of the ABC
6 News' division-wide special coverage on the Iraq
7 War.

8 "In case you missed it, click here:
9 ABC's Good Morning America segment on PGR.

10 "For Press & Media Requests...Please
11 send an email to media@patriotguard.org.

12 "Thanks!

13 "Kurt Mayer, National Public Relations
14 Director."

15 A. Yes.

16 Q. Did you post that on the website?

17 A. I did. I don't know if you can see
18 this on this printout that we are looking at
19 here. There is a faint line above "Media News
20 Flash." This is a text box. The one above it
21 is also a text box. That was my writing
22 there --

23 Q. Okay. Thank you.

24 A. -- within that box.

1 Q. And is this the story that you were
2 referring to --

3 A. Yes, it was.

4 Q. -- that kind of made the explosion on
5 the website, or is this separate?

6 A. No. This was a follow-on story after
7 the Associated Press story. This is what got
8 ABCs attention was the Associated Press story.

9 (Applicant's Exhibit 29 was
10 marked for identification.)

11 BY MR. O'MALLEY:

12 Q. Okay. All right. Thank you. This is
13 Applicant's Exhibit No. 29, which was produced
14 by PGR, identified as PGR 000113 through
15 PGR 000118. This document in the top left
16 corner of PGR 000113 states that the date is
17 Saturday, April 15, 2006. Do you recognize this
18 document?

19 A. Yes, I do.

20 Q. Okay. Can you turn to the fourth page,
21 which is PGR 000116. Can you read the sentence
22 that is above the words "Thanks for your
23 support!" at the bottom?

24 A. "If you'd like to support the PGR and

1 our missions further, click on the Paid Ads
2 frequently and purchase items you want from the
3 PGR Store."

4 Q. Okay. So we've seen from these
5 documents that this statement was on there on
6 December 28, 2005, December 30, 2005,
7 January 10, 2006, April 8, 2006, and here
8 April 15, 2006.

9 A. Right.

10 Q. Do you know whether that statement was
11 on PGR's website during that whole time period?

12 A. Yes, it was.

13 Q. Do you know whether it was on there
14 prior to that time period?

15 A. I do not. The first time I would have
16 observed the website would have been on that
17 last -- last week of November and I only recall
18 personally seeing it in December.

19 Q. Okay. What about after April 15, 2006,
20 do you have any knowledge as to how long that
21 may have stayed on?

22 A. I do not. I know it was there until --
23 it was there as long as I was there.

24 Q. How long were you there?

1 A. Actively involved, just past 4th of
2 July.

3 Q. Of --

4 A. Of 2006, I'm sorry.

5 MR. O'MALLEY: 2006. Okay. Thank you. Can
6 we take just about a five-minute break?

7 MS. PERRY: Are you nearly finished?

8 MR. O'MALLEY: Getting close to it, yes. I
9 just need to use the restroom.

10 MS. PERRY: That's fine.

11 (Recess taken.)

12 BY MR. O'MALLEY:

13 Q. Back on the record, please. Can you
14 turn back to Exhibit 28, please.

15 A. Yes, sir.

16 Q. And the first page there.

17 A. Yes, sir.

18 Q. Right in the middle of the page, there
19 is a statement that says, "Thank you for your
20 overwhelming support! If you would like some
21 more information about our organization or you
22 are wondering what you can do to help us honor
23 Americas Heroes, please email
24 info@patriotguard.org.

1 "We will get back to you as soon as we
2 can.

3 "Jason, Jeff, Kurt & the entire PGR
4 family."

5 A. Yes.

6 Q. So Kurt, that's you. Jeff, that's Jeff
7 Brown. Jason is Jason Wallin?

8 A. Yes.

9 Q. Who is the entire PGR family?

10 A. All the PGR members. I wrote this text
11 here in this particular box.

12 Info@patriotguard.org actually is a redirect to
13 my email, kurt@patriotguard.org. We did it this
14 way so that Jeff and Jason could also have
15 access to the emails that were streaming in
16 there.

17 This was in response to the thousands
18 of emails that we were getting that were just
19 overwhelming my own kurt.patriotguard.org box,
20 mailbox. So PGR family is just -- this is
21 intended -- targeted towards the media.

22 Q. Okay. And then in there you have the
23 words "our organization." Who is "our"?

24 A. Patriot Guard Riders.

1 Q. The organization, the corporation?

2 A. Yes, yes.

3 Q. Okay.

4 A. Patriot Guard Riders, Inc. and our
5 website and what we do and who we are, why we
6 are.

7 Q. If there was a use of the terms our or
8 we or us on this website, who in your opinion is
9 that referring to, if you know?

10 A. Referring to the entire organization.
11 That was always the purpose of this home page.
12 It's public relations oriented, right? So if
13 you're going here, whether you're a potential
14 member, a member, media, a member of the press,
15 you are trying to get a certain set of
16 information quickly without having to wade
17 through anything. So everything on this front
18 page was always in the context of the entire
19 organization, Patriot Guard Riders.

20 (Applicant's Exhibit 30 was
21 marked for identification.)

22 BY MR. O'MALLEY:

23 Q. Okay. Thank you. Okay. This is
24 Applicant's Exhibit No. 30, which was produced

1 by PGR, identified as PGR 006781 through
2 PGR 006783. This is a posting in forum on PGR's
3 website; is that correct?

4 A. Correct.

5 Q. And what forum does this show that it's
6 in?

7 A. It's in the state captain area.

8 Q. Okay. And the date of the post?

9 A. The date of the particular post or the
10 date of the page?

11 Q. The date of the posting.

12 A. Okay. The date of the posting is 16th
13 December 2005.

14 Q. Okay. At that time did you have access
15 to the state captain area?

16 A. Yes.

17 Q. Okay. Who is making this post?

18 A. Jason Wallin, who goes by the ride name
19 of Waldo, is making this post.

20 Q. Okay. In here he says, and I will kind
21 of read a little of it, he says, "Guys, After
22 attending the funeral of Dominic Sacco in
23 Topeka, I was truly moved by a pre-service
24 presentation made to the family on behalf of the

1 PGR and Air riders from Mulvane. The
2 presented" -- I think it should be they but,
3 "The presented the family with a signed by all
4 riders in the staging area 'we support our
5 troops' flag, a Challenge Coin from the Mulvane
6 ALR, and a large defenders of freedom patch for
7 the back of a jacket. After seeing this I felt
8 it would be something good to do on a national
9 level. After kicking it around with Jeff I was
10 thinking that we might be able to do something
11 like this as well. My thoughts were that we
12 would overnight to the ride captain/state
13 captain for each mission the following:

14 "1. A memorial plaque."

15 And if you turn to the second page,
16 there is a depiction of a memorial plaque which
17 appears to say, "On behalf of a grateful America
18 and the Patriot Guard Riders, please accept our
19 sincere condolences on your tragic loss. May
20 your pain be tempered by the knowledge that
21 Pfc" -- Pfc is private first class --

22 A. Yes.

23 Q. -- "John Smith" -- I don't know if that
24 was an actual person or just a pseudonym name to

1 be put in there, "is a true American Hero," and
2 then below that is what appears to be a folded
3 flag with the words "Patriot Guard Riders"
4 around it and "'Riding With Respect.'"

5 Then No. 2 below that is "3 X 5 'We
6 support our troops' flag to be signed by all
7 riders in attendance," with a depiction of the
8 flag on the third page saying, "This would be
9 presented by the ride/state captain either
10 before the service or at some other appropriate
11 time.

12 "What would you all think of something
13 like this?"

14 And then he states, "We could use the
15 revenue from the banner ads and store sales to
16 help defray any costs (BTW," by the way, "go
17 click on the ads if you would like to help
18 out)."

19 What does that last sentence or
20 paragraph mean to you?

21 A. Exactly what it says, that we could use
22 the revenue from people clicking on banner ads,
23 which generated revenue for us, and/or from
24 store sales to help defray the costs of

1 producing these plaques, which is ultimately the
2 way we ended up going, not with the signed flags
3 but with the plaques.

4 (Applicant's Exhibit 31 was
5 marked for identification.)

6 BY MR. O'MALLEY:

7 Q. Okay. Thank you. This is Applicant's
8 Exhibit No. 31, which was produced by PGR and
9 identified as PGR 006861. Here there is a post
10 dated January 9, 2006, from Twister. And who is
11 Twister again?

12 A. Jeff Brown.

13 Q. Okay. Can you read his posting there?

14 A. "Steve, I like what you did very much.
15 However, as a SC," state captain, "you should be
16 aware that National pays for a memorial plaque
17 that we present to the family. I think it's an
18 excellent memorial to present. I like the
19 memorial book idea...if you'll give me an idea
20 of where you got it, I'll see about setting
21 something up so all SC," state captains, "can
22 order it and National pay for it (depending on
23 cost).

24 "Thanks, Jeff."

1 Q. Okay. So what do you understand will
2 be happening or has happened in the past from
3 this posting?

4 A. We took ideas about how to publicize
5 the organization or memorialize events that had
6 cost, and we offset the costs by revenue streams
7 generated from the ads and from the store sales.

8 Q. Okay. And who was paying for these
9 plaques?

10 A. I believe Jason was initially, and then
11 there was a group that we assigned to actually
12 be responsible for ordering the plaques, and I
13 personally don't recall who they got their funds
14 from and how they actually paid for those
15 plaques.

16 Q. Okay. If you look to the second
17 sentence in there, does that refresh your
18 recollection?

19 MS. PERRY: Objection, leading.

20 BY MR. O'MALLEY:

21 Q. Can you read the second sentence?

22 A. I will. It was always --

23 MS. PERRY: Objection, asked and answered as
24 well.

1 MR. O'MALLEY: You can answer.

2 A. It was always my impression that
3 national paid for the plaques. As to whether it
4 was from the books of the generated revenue from
5 the store ads or from the books of revenue from
6 the store, I don't recollect which set of books
7 they were paid for, but it was paid for by
8 national organization from funds, revenue,
9 coming in to the national organization to order
10 those plaques, pay for them, and there was no
11 profit on those plaques. We were giving them to
12 families of fallen soldiers.

13 (Applicant's Exhibit 32 was
14 marked for identification.)

15 BY MR. O'MALLEY:

16 Q. Okay. Thank you. This is Applicant's
17 Exhibit No. 32, which was produced by PGR,
18 identified as PGR 006864 through PGR 006878.
19 This is another posting from Patriot Guard
20 website's forums?

21 A. Yes, sir.

22 Q. Which forum is that?

23 A. It would be from the state captain's
24 forum. This is the state captain area.

1 Q. And the first posting in this thread
2 for a better term, what is the date of that?

3 A. 19 January 2006.

4 Q. So at that time did you have access to
5 the state captain area?

6 A. Yes.

7 Q. Okay. The first post is by an
8 individual who is identified as Dinky Dau, is
9 that --

10 A. Dinky Dau, Jim Lorenzo, yes.

11 Q. Is that his ride name, road name or --

12 A. His ride name, yes, Dinky Dau.

13 Q. Can you read what his post says,
14 please?

15 A. "What do you think about State Captains
16 giving 20.00 per year as dues to be donated to a
17 fund. Then once a year we will have a party for
18 State Captains so that we can all get together
19 and pass along ideas or lessons learned from
20 other State Captains. Just an idea?!?"

21 Q. Okay. Can you scroll down to the next
22 posting?

23 A. Next posting, yes.

24 Q. And when was that written?

1 A. 20th of January, 2006.

2 Q. And by whom?

3 A. By IndyHarley, who is Richard Wilbur.

4 Q. And what was his response?

5 A. "No dues - buy from the PGR store."

6 Q. Now, why would he say that?

7 MS. PERRY: Objection. That calls for
8 speculation.

9 MR. O'MALLEY: If you know.

10 A. I actually do know. I had the
11 conversation with Richard Wilbur personally. It
12 was a stupid idea to have dues. We already had
13 a revenue stream, that if people wanted to help
14 fund the organization, they could buy things
15 from the PGR store. That directly funded our
16 efforts.

17 Q. Okay. Can you read Dinky Dau's
18 response to IndyHarley?

19 A. I've made several purchases from the
20 Store, but that is not going to fund a gathering
21 for Captains to exchange ideas and pass on
22 experiences. The store funds PGR and all of its
23 expenses plus the new plaques that they're
24 putting out.

1 Q. So based on your understanding, what is
2 the understanding of IndyHarley and Dinky Dau
3 who are making these posts as to where revenue
4 comes from for PGR?

5 MS. PERRY: Objection, calls for speculation
6 again.

7 MR. O'MALLEY: If you know, you can answer.

8 A. I do personally know what Richard
9 Wilbur's understanding was, which is equivalent
10 to mine, that the Patriot Guard Riders store was
11 funding the organization, as was the paid ads.
12 I do not recall speaking directly with Jim
13 Lorenzo on this topic.

14 Q. Okay. Can we move forward in this post
15 or in this thread, I apologize, to PGR 006869?

16 A. Yes, sir.

17 Q. There is a post on the bottom by
18 Twister. That's Jeff Brown?

19 A. Yes, sir.

20 Q. What date is this taking place on?

21 A. 28th of January, 2006.

22 Q. And so how would it work for him to
23 post on this? Even though these other posts we
24 talked about took place on January 19 and

1 January 20, he is posting on January 28, '06.

2 What would this look like when you went to a
3 website or went to a forum?

4 A. That someone is posting a week later.
5 I'm not sure what the question is.

6 Q. Sure. Jeff is posting on January 28,
7 2006.

8 A. Yes.

9 Q. If he's posting, would he have had
10 access to see all the prior --

11 MS. PERRY: Objection, leading. Please
12 rephrase the question.

13 MR. O'MALLEY: Sure.

14 Q. What would Jeff see on the forum that
15 he is posting on here?

16 A. Exactly what you and I are seeing here.
17 It is a thread. We at executive level had
18 access to -- unlimited access to any part of the
19 entire website, including all of its forums. So
20 Jeff, Jason, and myself would have been able to
21 read any of these threads, and so here he is
22 almost a week later after this very active
23 discussion commenting after having read this
24 entire thread.

1 Q. Okay. What does he say there?

2 A. I will refrain from editorializing, but
3 he says, "I think all of you ought to just give
4 me \$20 a month each and once a year, I'll throw
5 myself a huge party and call each of you the
6 next day and tell you all about it."

7 Q. Okay. So is he --

8 A. He is being sarcastic here. Sorry just
9 to volunteer that but --

10 Q. Okay. Thank you. Can we scroll down a
11 few more pages to PGR 006872? Are you there?

12 A. I'm here. Sorry. Yes.

13 Q. There is a post dated January 30, 2006,
14 by Sgt potsie, I'm guessing Sergeant Potsie. Is
15 that correct?

16 A. Yes, sir; yes, sir.

17 Q. And his post here says, "Obviously it
18 has it's ups and downs. If National says they
19 do not need outside donations to fund
20 operations, I am not gonna kick a dead horse and
21 insist they take my money. Personally, I don't
22 like the potential of the National leadership
23 having to dig into their pockets to pay for
24 plaques, server expenses, etc. As of now they

1 get the money from PGR store sales and ad
2 clicks, but what happens during slow times? It
3 is my hope that they would ask the help of at
4 least the state captains if they needed it."

5 Turning the page, "But for now, it
6 seems to be working well. Should the need arise
7 to kick a few bucks their way, I'll be more than
8 willing."

9 What is your understanding of what
10 Sergeant Potsie is talking about here?

11 MS. PERRY: Objection. This calls for
12 speculation as does this entire line of
13 questioning. These are other people's posts.
14 He has no personal knowledge as to any of this.

15 MR. O'MALLEY: Okay.

16 MS. PERRY: And I object strongly.

17 MR. O'MALLEY: Okay. You can answer.

18 A. I am not sure which to answer first. I
19 most definitely have direct knowledge of this.
20 I was involved in these discussions on phone
21 calls with the executive team. This is in the
22 context of a point in time in the organization
23 where we were discussing whether ads and store
24 revenue is going to be sufficient to fund the

1 organization. An idea was kicked around to put
2 a link on the website that basically said donate
3 to the PGR, and there was objections to that. I
4 never really understood them, but there was this
5 constant discussion of why can't people just
6 donate money. There's people that want to write
7 a check for a thousand dollars to the PGR. Just
8 get it. And we just kept having this discussion
9 over and over again.

10 And this is just one of these
11 discussions, and Potsie in particular is one of
12 the ones that just said he has people trying to
13 give money to the PGR. They don't want to buy
14 things. They just want to give money. How can
15 they do that?

16 Q. Okay.

17 A. That was in the context of that period
18 of time when we were having sometimes very
19 heated discussions about how people could just
20 donate.

21 (Applicant's Exhibit 33 was
22 marked for identification.)

23 BY MR. O'MALLEY:

24 Q. Okay. This is Applicant's Exhibit

1 No. 33, produced by PGR, identified as
2 PGR 002232. And this document appears to have
3 two email messages in connection with it. About
4 partway down there's something that says
5 "Original Message" from Chip that was sent
6 February 24, 2006, to an address
7 David240@aol.com and cc'ing
8 jbrown@patriotguard.org.

9 Whose email is jbrown@patriotguard.org?

10 A. Jeff Brown.

11 Q. Okay. So in this statement it says,
12 "Subject: Patriot Guard." The substance of the
13 email says, "David, My name is Chip Elliott and
14 I am the Connecticut State Captain. We have a
15 Connecticut web site which can be found at
16 <http://www.patrioguardct.org>.

17 "If you give me permission and send me
18 the information, I will post your name,
19 nickname, city, state and email address (which
20 will be blocked from bots).

21 "Our National Site is the best place to
22 get current information, stay in touch with the
23 National happenings, etc. Our local site will
24 hold all local information such as missions,

1 mission status, etc.

2 "Thank you for your interest, and
3 forward me that information if you wish to
4 become an active member of the CT chapter of
5 PGR.

6 "Chip," and then it says "Micah 6:8."

7 There is a response to this email by --
8 well, actually it is by Jeff Brown but through a
9 different email address. It is
10 jeffbrown@valornet.com.

11 A. Correct.

12 Q. Is that one of Jeff's email addresses?

13 A. Yes.

14 Q. Sent the same day, February 24, 2006.
15 And who is Jeff writing to here?

16 A. He is writing to Chip Elliott. This is
17 a response to Chip that Jeff and I had discussed
18 in a phone call, and we felt that we just -- we
19 couldn't have each and every state and have that
20 explode from there, everyone have all these
21 websites. There was no way we were going to be
22 able to control how the organization was run and
23 how we would act in the same manner if all these
24 different websites were allowed to proliferate.

1 This was the first one that came up where
2 someone just took it upon themselves to go
3 create another Patriot Guard website. Best
4 intentions as he explains here in his email to
5 Jeff or cc'ing Jeff, that, you know, he felt
6 that a local website was warranted for local
7 people, and national could do their thing.

8 But Jeff and I vehemently opposed that
9 idea. So Jeff and I discussed this, and this
10 was really our response, but he was responding
11 as executive director to Chip, saying sorry, we
12 just can't allow this.

13 Q. Okay. And are you copied on this
14 email?

15 A. I am.

16 Q. Are other PGR executives or members
17 identified on this email?

18 A. Yes. One other director and then other
19 people that we consider to be part of our head
20 shed, if you --

21 Q. Who was the other director?

22 A. Jason, Jason Wallin.

23 Q. And then who are the other people that
24 were --

1 A. Hugh Knaus was our web administrator.
2 Kevin Smith handled -- he was our forum
3 administrator. So he handled a lot of the --
4 keeping the forum clean and trying to reduce the
5 arguing, and Bonnie was our national ride
6 captain.

7 Q. Okay. Can you read the response for
8 me, please?

9 A. Yes. "Chip, I really hate to do this,
10 but the Patriot Guard Riders cannot allow
11 individual state PGR sites for various legal and
12 administrative reasons. Legally, it opens the
13 door for unauthorized use of the name and logo
14 and sets a precedent that, should it ever be
15 contested, weakens our position against the
16 unauthorized use. Administratively, we have
17 found that information that should be on the
18 national site gets posted to a state site and
19 people begin missing information. I hope you
20 understand.

21 "Thanks, Jeff Brown 'Twister,'
22 Executive Director, Patriot Guard Riders."

23 Q. Okay. So in this statement Jeff states
24 the Patriot Guard Riders cannot allow individual

1 state PGR sites. Why does he state --

2 MS. PERRY: Objection. That's also calling
3 for speculation, someone else's state of mind.

4 MR. O'MALLEY: He just stated that he was
5 involved in this whole discussion.

6 Q. What is your understanding of why he
7 stated this?

8 A. I actually helped proofread this very
9 text, and in the context of my understanding as
10 we crafted this is that we were representing the
11 Patriot Guard Riders and helping other
12 individuals understand that as a national
13 organization, that we needed to have consistency
14 and -- a consistent presence and delivery of
15 what it was that we were, what we stood for, and
16 how we operated, and that if we allowed other
17 teams, if you will, to try to emulate what we
18 do, we are going to lose control. Something bad
19 was going to happen if we did that.

20 Q. Okay.

21 A. So we were trying to communicate
22 through this that we have to retain that control
23 as an organization of every aspect of what we
24 do, from the public relations, logos, banners.

1 I can't tell you how many times people wanted to
2 make 12-foot, 14-foot banners that just -- they
3 came up with their own design, and some of it
4 was good. Some of it was bad. And we just
5 consistently tried to get that message out
6 there, folks, you can't do this. This is the
7 reason we have a national organization, to
8 protect our image, to protect what we do, and
9 ultimately to protect the families that we're
10 standing for.

11 Q. Okay. In connection a few lines down
12 here are the words "weaken our position." Who
13 is "our" referring to in this email?

14 MS. PERRY: That's speculation, objection.

15 MR. O'MALLEY: He just stated that he helped
16 draft this email. You can answer.

17 A. "Our" is the organization Patriot Guard
18 Riders.

19 Q. Okay. Same question a little further
20 down. It says, "Administratively, we have found
21 that information." Who is "we"?

22 MS. PERRY: Objection again, speculation.

23 MR. O'MALLEY: You can answer. I'm sorry.

24 A. It's our organization. Specifically

1 the "we" that we are referring to here is the
2 executive team, executive directorship of the
3 Patriot Guard Riders of which, I, Jason Wallin,
4 and Jeff Brown collectively were the executive
5 team.

6 (Applicant's Exhibit 34 was
7 marked for identification.)

8 BY MR. O'MALLEY:

9 Q. This is Applicant's Exhibit No. 34,
10 produced by Jeff Brown and identified as
11 BROWN007994. Can you tell me what this document
12 is?

13 A. Yes. This is essentially a message to
14 someone to cease and desist using our logos in
15 whatever way they were representing them,
16 usually best intentions, trying to point back to
17 our website, but sometimes the context of the
18 website was -- I thought it would put us in a
19 tenuous position, and Jeff did too. This was
20 one of the things that we policed for.

21 Q. Okay. And who sent this email?

22 A. Jeff Brown.

23 Q. And who did he send it to?

24 A. He sent it to whoever dsj30c@yahoo.com

1 was, and it was cc'd to myself and Jason
2 Wallin --

3 Q. So --

4 A. -- through the execs. I'm sorry.
5 Exec@patriotguard.org is a Microsoft exchange
6 email group that was myself, Jeff Brown, and
7 Jason Wallin.

8 Q. Okay. And can you read the email here?

9 A. "Dear Sir or Madam, Please remove the
10 Patriot Guard Riders Logos from your website.
11 Although we appreciate your position on the war,
12 we feel your site is purely political in nature
13 and the use of PGR logos intimates our support
14 of these views."

15 Q. Can you read the signature line?

16 A. "Sincerely, Jeff Brown 'Twister,'
17 Executive Director, Patriot Guard Riders,
18 www.patriotguard.org."

19 Q. Okay. So in connection with -- we have
20 talked a bit here about your and Jeff's working
21 together to stop what you collectively thought
22 was improper use of PGR names, marks. In
23 connection with that, did you ever have
24 discussions with Jeff regarding the ownership of

1 the marks as to who was the owner of the marks?

2 MS. PERRY: Objection, leading. Please
3 rephrase.

4 BY MR. O'MALLEY:

5 Q. During your discussions with Jeff, did
6 there ever come a time to discuss ownership?

7 A. Yes.

8 Q. What were those discussions about?

9 A. Discussions were about that the
10 trademarks, if you will, the logos, the banners,
11 tri-cornered logo, they belonged to the Patriot
12 Guard Riders. They belonged to the
13 organization, Patriot Guard Riders.

14 Q. Was there any ever discussions of
15 licenses relating to the marks?

16 A. Yes.

17 Q. Can you explain?

18 A. People would ask if they could be
19 licensed, permitted to produce materials on
20 their own. Minnesota state captains for one
21 wanted to produce their own banners. They
22 wanted to -- actually wanted to operate their
23 own store in a way that was Patriot Guard Riders
24 but highlighted Minnesota's involvement, and

1 those types of things were generally rejected by
2 Jeff as the executive director of Patriot Guard
3 Riders that he didn't -- he wanted to keep all
4 production of public relation materials, the
5 logos and banners and such as part of that, in a
6 central part of the organization, in national.

7 Q. Okay. Now, you stated that your I
8 guess -- is the proper term leadership position
9 ended right around July 4th of '06?

10 A. There was a period right after going --
11 right after Memorial Day where I was invited to
12 the White House, had breakfast with the
13 president there, that caused particular problems
14 with my family, and so I temporarily stepped
15 down a few weeks after Memorial Day.

16 I just couldn't stand it, got
17 reinvolved in a very, very major worldwide event
18 for July 4, for a Dodgers game with a live video
19 presentation from Sergeant Vasquez in Iraq that
20 was going to be shown on the Jumbotron at the
21 Dodgers game on July 4, involved arranging with
22 the Air Force to do a flyover over the stadium
23 and have a live video stream from Iraq.

24 And so I orchestrated, put that

1 together, and that was July 4. And that in
2 particular -- that event in particular was very,
3 very stressful to my marriage and my family. So
4 it was the week after July 4 that I just
5 formally resigned from my national director
6 role.

7 Q. Okay. Did you remain involved in PGR
8 after that time?

9 A. I did, as a ride captain and went on
10 missions.

11 Q. Okay. If you know, when did Jeff Brown
12 end his time as the executive director of
13 Patriot Guard Riders, Inc.?

14 A. I had gotten several phone calls in the
15 fall from Snap, from Bonnie, telling me that
16 Jeff was resigning. By that time in the fall, I
17 had ceased going daily to the website and
18 looking through forums.

19 Q. Do you have any knowledge based off of
20 those conversations with Snap and -- and who is
21 Snap?

22 A. I'm sorry, Bill -- I just froze on his
23 last name, Lines, Bill Lines.

24 Q. Okay. Do you have any knowledge based

1 on your conversations with Snap, Bill Lines, and
2 Bonnie as to the reasons for Jeff Brown's
3 resignation?

4 MS. PERRY: Objection. That calls for
5 hearsay and speculation.

6 A. I can only --

7 MR. O'MALLEY: Go ahead and answer.

8 A. -- repeat what I was told. I was told
9 that it came out that Jeff in some way was
10 actually profiting from our organization and our
11 efforts and that there was a backlash from the
12 organization -- the Patriot Guard Riders
13 organization that was outraged about that, and
14 because of that -- I was told it was because of
15 that he was resigning.

16 Q. Okay. What are your thoughts on that?

17 MS. PERRY: Objection, irrelevant.

18 MR. O'MALLEY: You can answer.

19 A. I was sickened to my stomach.

20 Q. Why?

21 MS. PERRY: Objection, irrelevant.

22 A. Do you want me to answer?

23 BY MR. O'MALLEY:

24 Q. Yes, please.

1 A. Just give me a minute.

2 Q. Take the time you need.

3 A. When I reached out to Jason Wallin and
4 to Jeff Brown in December of 2005, I said I want
5 to help. I was outraged that any individual
6 would go to a funeral and do any act that would
7 be dishonorable or cause further grief to a
8 family that had just lost a precious person in
9 defense of our country.

10 I poured my life into this
11 organization. For over seven months, I did over
12 400 television, magazine, radio, newspaper
13 interviews, all hours of the night, seven days a
14 week, nearly lost my family and my marriage, but
15 convinced I was doing the right thing for my
16 country, albeit out of balance on a personal
17 level, and then to find that I'm being told that
18 some person was profiting from this at other
19 families' expense, families that had lost
20 precious people defending our country, it
21 sickened me to my stomach. That's how I felt
22 about it.

23 MR. O'MALLEY: Okay. Thank you. We will
24 take about a five-minute break.

1 MS. PERRY: Are you finished questioning?

2 MR. O'MALLEY: I might have a few final ones,
3 but we are right at the end.

4 (Recess taken.)

5 MR. O'MALLEY: Back on the record. We have
6 no further questions.

7 MS. PERRY: Okay.

8 CROSS-EXAMINATION

9 BY MS. PERRY:

10 Q. I'm Jenna Perry, and I am an attorney
11 representing Jeff Brown in Opposition
12 No. 91181448. I am going to ask you a series of
13 questions, and I would like for you to answer
14 them as fully and truthfully as possible.

15 You understand that you are still under
16 oath, correct?

17 A. Correct.

18 Q. So you have a duty to answer every
19 question that I ask truthfully and fully. If
20 you don't understand a question, will you tell
21 me?

22 A. I will.

23 Q. Some of these questions may be
24 redundant, but I ask for your patience and

1 request that you answer each question truthfully
2 and fully as if asked for the first time.

3 Have you ever been convicted of a
4 crime?

5 A. No, ma'am.

6 Q. Have you ever been charged with a
7 crime?

8 A. No, ma'am.

9 Q. Is Mr. O'Malley or anyone at this law
10 firm, Clark Hill, your attorney?

11 A. I believe they are representing me.

12 Q. Okay. Have you spoken with
13 Mr. O'Malley about the deposition prior to
14 today?

15 MR. O'MALLEY: I will caution you to not
16 divulge anything that -- our specific
17 communications, but you can speak generally.

18 A. The answer is yes.

19 BY MS. PERRY:

20 Q. Okay. How much have you spoken with
21 Mr. O'Malley or anyone at Clark Hill, this law
22 firm, in the past couple of weeks?

23 A. Once.

24 Q. For how long?

1 A. Maybe 30 minutes.

2 Q. Okay. How about prior to the last
3 couple of weeks, in the past few years, how much
4 time have you spent speaking with Mr. O'Malley
5 or someone at this law firm?

6 A. Previous deposition.

7 Q. And how much time was spent?

8 A. At the deposition?

9 Q. No, I'm sorry. Prior to the deposition
10 talking with Mr. O'Malley or somebody --

11 A. Which deposition are you referring to
12 now?

13 Q. Any of them, all of them.

14 A. Very little, maybe 30 minutes total
15 prior.

16 Q. Okay. Did you look at any documents
17 before you came in today?

18 A. I did not.

19 Q. Did you look at any of the documents
20 entitled Applicant's Exhibit number -- I believe
21 they start with 24 through 34 prior to today's
22 deposition?

23 A. I recognize them as documents that Jim
24 had with him.

1 Q. Did you speak with Mr. O'Malley about
2 any of the documents prior to today?

3 A. Only that I was going to be
4 presented -- they were going to be presented,
5 and I was going to be asked to speak to them.

6 Q. And did you take a look at them prior
7 to today?

8 A. Not in any great detail, no.

9 Q. But you did see them?

10 A. I saw that he had them with him, yes.
11 They were bundled together. We just were -- he
12 was reminding me what a deposition was and how
13 it proceeds, what the procedure was and how to
14 act during the deposition.

15 Q. Did you look at the content of them
16 prior to the deposition?

17 A. No.

18 Q. Can you say that again?

19 A. I'm sorry. No. I should say it
20 clearly. My apologies.

21 Q. You stated that your first contact with
22 PGR generally was in about November of 2005,
23 correct?

24 A. Correct.

1 Q. And that your tenure on the board of
2 directors ended on July 4, 2006; is that
3 correct?

4 A. Not precisely. It was more like
5 towards the end of July.

6 Q. Okay. What was your involvement after
7 the time that you resigned in the PGR, Inc.?

8 A. Making posts on the website, attending
9 funeral missions, and that was it.

10 Q. How long did that extend after your
11 resignation from the board of directors?

12 A. In two parts. Actively going to the
13 website and engaging in conversations, probably
14 only until about November of 2006, with the
15 exception of occasional posts over the years.
16 In terms of riding on funerals, I believe I did
17 one earlier this year. I'm still involved in
18 terms of an active participant at funeral
19 missions.

20 Q. So would you consider yourself still a
21 member of PGR, Inc.?

22 A. Oh, absolutely.

23 Q. I want you to take another look at
24 Exhibit No. 25, if you will, please.

1 A. Yes, ma'am.

2 Q. And as Mr. O'Malley pointed out, the
3 statement which I am going to ask you about is
4 also in other exhibits as well, at least 25, 26,
5 27, and 29, and I may be leaving some out, but
6 those are the ones produced today that have this
7 statement. If you will look on the page
8 numbered PGR 000092, the statement at the
9 bottom, "If you'd like to support the PGR and
10 our missions further, click on the Paid Ads
11 frequently and purchase items you want from the
12 PGR Store."

13 Do you recall giving testimony about
14 this statement?

15 A. I do.

16 Q. Do you know who wrote this statement?

17 A. This was multiple authorship on this
18 particular text box, and it would have been
19 myself, Jason, and Jeff.

20 Q. So can you say with certainty who wrote
21 this specific statement?

22 A. I cannot.

23 Q. Okay. You also gave testimony
24 regarding your opinion of the domain name and

1 why it was used, patriotguard.org. You stated
2 an opinion with respect to what you felt that
3 dot-org meant.

4 A. Yes.

5 Q. Is it a requirement that an
6 organization be an organization in order to
7 adopt a dot-org domain name, or can anyone
8 choose the domain name dot-org and use it?

9 I can rephrase the question if you
10 want.

11 A. No. I'm recalling what organizations
12 were in control of domain names at that time,
13 and at that time it was not a requirement.

14 Q. It was not a requirement to be an
15 organization to adopt a dot-org domain name; is
16 that correct?

17 A. That's correct.

18 Q. I'm sorry if I'm skipping around. I
19 jotted notes as you were giving testimony.

20 Do you currently have a position at
21 PGR, Inc.?

22 A. Member.

23 Q. You stated that there were discussions
24 between you and Jeff Brown regarding ownership

1 of the trademarks. Do you recall that in your
2 previous testimony today?

3 A. Do I recall saying that or recall the
4 conversations?

5 Q. No. Do you recall the testimony that
6 you gave today that you said that you had
7 conversations?

8 A. I do.

9 Q. When did these conversations occur?

10 A. Multiple times over -- primarily over
11 the period of January to May 2006.

12 Q. Do you remember specifics of the
13 conversations?

14 A. I do. I do.

15 Q. Can you state them?

16 A. Most of the conversations centered
17 around Jeff's opinion that these visual
18 representations, these logos, these banners,
19 were identified with the Patriot Guard Riders
20 organization, with our organization, and that by
21 association there could be negative
22 connotations, negative misunderstandings by
23 people if these visual representations of the
24 Patriot Guard Riders were found on other

1 websites that were contrary to the message that
2 we were trying to propagate about who we were.

3 Q. Okay. Thank you. You also brought up
4 your disappointment with Jeff Brown and Jason
5 Wallin and their involvement in what you stated
6 was a for-profit use of PGR; is that correct?

7 A. That is not correct. I never mentioned
8 Jason Wallin's involvement.

9 MS. PERRY: Can we read the transcript back
10 from that portion of it.

11 (Record read as follows:

12 "A When I reached out to Jason Wallin
13 and to Jeff Brown in December of 2005,
14 I said I want to help. I was outraged
15 that any individual would go to a
16 funeral and do any act that would be
17 dishonorable or cause further grief to
18 a family that had just lost a precious
19 person in defense of our country.

20 I poured my life into this
21 organization. For over seven months,
22 I did over 400 television, magazine,
23 radio, newspaper interviews, all hours
24 of the night, seven days a week,

1 nearly lost my family and my marriage,
2 but convinced I was doing the right
3 thing for my country, albeit out of
4 balance on a personal level, and then
5 to find that I'm being told that some
6 person was profiting from this at
7 other families' expense, families that
8 had lost precious people defending our
9 country, it sickened me to my stomach.
10 That's how I felt about it.")

11 BY MS. PERRY:

12 Q. Okay. You brought up Jason Wallin's
13 name at the very beginning of this and Jeff
14 Brown's as well.

15 A. Framed in the context of the question.

16 Q. Let me ask a question. Were you aware
17 that Jason Wallin was profiting from certain
18 sales ads, et cetera, from PGR?

19 MR. O'MALLEY: Objection, time frame.

20 MS. PERRY: At any time.

21 A. Yes.

22 Am I going to be asked what time frame?

23 I'm sorry.

24 MS. PERRY: Let me take a quick break, and I

1 may or may not have further questions.

2 MR. O'MALLEY: Okay. Sure.

3 (Recess taken.)

4 MS. PERRY: I am ready, and I have no further
5 questions.

6 MR. O'MALLEY: Okay. We have just a couple
7 on redirect.

8 REDIRECT EXAMINATION

9 BY MR. O'MALLEY:

10 Q. You had mentioned that you were upset
11 when you came to find that Jason Wallin had been
12 profiting as well?

13 A. Correct.

14 Q. What time frame was that when you found
15 out about that?

16 A. At the prior deposition. I am having
17 trouble recalling whether that was three years
18 or four years ago.

19 Q. At your prior deposition?

20 A. Deposition in Tulsa, Oklahoma.

21 Q. Okay. So whenever --

22 A. That's when I found -- I was told
23 secondhand that Jason had revealed that he also
24 was profiting in some manner.

1 Q. Okay. Do you remember when those were?

2 I apologize. To the best of your recollection.

3 A. The deposition?

4 Q. Yes, I'm sorry.

5 A. I thought it was 2008, but I'm not 100
6 percent sure.

7 Q. Okay. But --

8 A. Actually, I can piece this together.
9 Hang on. My son had just started at the
10 University of Oklahoma. Yes, it would have been
11 2008.

12 Q. Okay. Month --

13 A. He was a freshman.

14 Q. Do you know the time, what part during
15 the year?

16 A. It would have been after he started in
17 August.

18 Q. Okay. We talked about the domain name
19 patriotguard.org and patriotguardstore.org, and
20 Ms. Perry had asked you whether the dot-org or
21 the dot-org top level domain, whether there was
22 a requirement that was in place in order to use
23 that top level domain, did you have to be an
24 organization.

1 A. Right.

2 Q. And your answer to that was no,
3 correct?

4 A. That is correct. That was my answer.

5 Q. Right. What was your impression as to
6 why dot-org was used in connection with the
7 patriotguard.org?

8 A. At that time and as it is today, the
9 dot-org typically signifies a noncommercial
10 venture. An organization focused on the family,
11 FFOZ.org -- I mean it's a Christian organization
12 that is a nonprofit that exists for their
13 specific nonprofit reasons. They have a
14 dot-org.

15 You will see many, many examples of
16 that with organizations that are set up for
17 specific purposes, not profit, and so they would
18 be noncommercial, so they would be a dot-org.

19 Q. Okay. And so with regard to
20 patriotguard.org, why was dot-org used in
21 connection with patriotguard.org?

22 A. It was always our intention to be a
23 nonprofit organization, to be an organization
24 set up to serve these families of fallen

1 soldiers.

2 Q. And what was your personal impression
3 of why dot-org was used in connection with the
4 domain name patriotguardstore.org?

5 A. My understanding, that it was a
6 redirect from patriotguard.org. So you can have
7 multiple domain names associated with a primary
8 domain name, and sometimes they all just go the
9 same place. Sometimes they are used for the
10 purposes of redirecting traffic for load level,
11 other purposes, much like pressing one, two, or
12 three on a recorded phone call to send you to
13 the right place. You are calling in to the same
14 place, but press two to do this, three to do
15 that, and it goes to some other part of the
16 automated system. It's very much like that.

17 Q. Okay. For this redirect to the Patriot
18 Guard store, what is your impression of why the
19 top level domain dot-org was used in connection
20 with the store?

21 A. Because patriotguard.org was already a
22 dot-org. Again, my understanding is this is
23 just another one of our web servers that we had
24 split off the traffic on to another physical

1 computer, a web server, so that we could balance
2 the load of requests coming in. So the first
3 one is a dot-org. So the other ones were
4 dot-orgs. There would have been no reason to do
5 anything different. Like a dot-edu or a dot-gov
6 or a dot-net or dot-com, I mean you stick with
7 what you started with typically when you are
8 sitting up websites.

9 MR. O'MALLEY: No further questions.

10

11

12 (WITNESS EXCUSED.)

13

14

15

16

17

18

19

20

21

22

23

24

1 IN THE UNITED STATES
2 PATENT AND TRADEMARK OFFICE
3 BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

4 JEFF BROWN,
5 Opposer,
6 vs. Opposition
 No. 91181448
7 PATRIOT GUARD RIDERS, INC.,
8 Applicant.

9

10

11

12

13

14

15

16

17

18

19

20

21

22


23

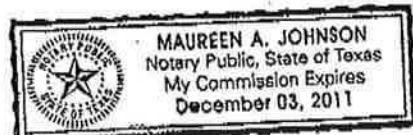
24

I, KURT ALLEN MAYER, being first duly
sworn, on oath say that I am the deponent in the
aforesaid deposition taken on August 2, 2011;
that I have read the foregoing transcript of my
deposition, consisting of pages 1 through 88
inclusive, and affix my signature to same.


KURT ALLEN MAYER

Subscribed and sworn to
before me this 3rd day
of November, 2011


Notary Public



1 ERRATA SHEET

2 Pg/Ln Correction

3 ___/___ Change from: _____

4 Change to: _____

5 ___/___ Change from: _____

6 Change to: _____

7 ___/___ Change from: _____

8 Change to: _____

9 ___/___ Change from: _____

10 Change to: _____

11 ___/___ Change from: _____

12 Change to: _____

13 ___/___ Change from: _____

14 Change to: _____

15 ___/___ Change from: _____

16 Change to: _____

17 ___/___ Change from: _____

18 Change to: _____

19 ___/___ Change from: _____

20 Change to: _____

21 ___/___ Change from: _____

22 Change to: _____

23

24 Signature: _____ Date: _____

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 24

Tact and Political Correctness were developed by those who lack the testicular fortitude to say what they really mean!

MotorSarge •
Posts: 31
Kansas

[Send Email](#)
[New Page](#)

04 Dec 2005 1:49 PM

Who are we sending the completed Releases back to?

"MotorSarge"

"MotorSarge"

Twister •
Posts: 1811
Broken Arrow, OK



[Send Email](#)
[New Page](#)

04 Dec 2005 4:57 PM

eaabker...I remembered.

PRESS RELEASE

National Network Of Bikers Honor Fallen Soldiers While Shielding Mourners From Protestors

Broken Arrow, OK - December 04, 2005 -- A nation-wide melding of almost 1500 individual motorcycle riders, along with many biker associations, ride together as the "Patriot Guard Riders" to honor fallen soldiers at funeral services across the nation. While paying their respects, they also do their best to block any protestors present from the view of the soldier's family, friends and other mourners.

Throughout America, the recently formed "Patriot Guard Riders", has formed a network of members who use the DOD, Internet, and word of mouth to keep abreast of funeral service arrangements for fallen soldiers. Their website (www.patriotguard.org) spreads the word to their nation-wide membership in order to set up Mission Rides to pay their respects. Working closely with the family, local law enforcement, and the local community, the Patriot Guard Riders have gathered as many as 200 riders at a time to honor a fallen soldier.

A small group of protestors from Salina, KS, The Westboro Baptist Church, travel the nation using many soldiers' funerals as a soapbox for their anti-gay platform.

Although their main objective is to honor those men and women who have paid the ultimate price for our nation's freedom, their secondary goal is to diminish interruptions in the solemn services caused by

PGR 006714

<http://www.patriotguard.org/ALLForums/tabid/61/forumid/196/postid/461/view/topic/Default.aspx>

11/25/2008

protestors. Whenever physically possible, and allowed by local law enforcement, the bikers will form a blockade around the reserved protest area and block them and their protest signs from the view of the mourners. In many instances, at the request of the soldier's family, the bikers will rev their engines to drown out any protestor's chants.

After the service, the bikers line the funeral procession route standing at attention and saluting as the hearse, family cars and mourners pass. With flags flying, they then trail the procession to the cemetery to pay their final respects.

Patriot Guard Riders Mission Statement

The Patriot Guard Riders is a diverse amalgamation of riders from across the nation. We have one thing in common besides motorcycles. We have an unwavering respect for those who risk their very lives for America's freedom and security. If you share this respect, please join us.

We don't care what you ride, what your political views are, or whether you're a "hawk" or a "dove". It is not a requirement that you be a veteran. It doesn't matter where you're from or what your income is. You don't even have to ride. The only prerequisite is Respect.

Our main mission is to attend the funeral services of fallen American military heroes. Each mission we undertake has two basic objectives.

1. Show our sincere respect for our fallen heroes, their families, and their communities.
2. Protect the mourning family and friends from interruptions created by any protestor or group of protestors.

We accomplish the latter through strictly legal and non-violent means.

For more information, please contact:

Jeff Brown "Twister", National Director
jbrown@patriotguard.com

Jason Wallin "Waldo", Communications Director
waldo@patriotguard.org

www.patriotguard.org

##

In the end, we remember not the words of our enemies, but the silence of our friends.
Martin Luther King, Jr.

VenturaCowboy

PGR 006715

<http://www.patriotguard.org/ALLForums/tabid/61/forumid/196/postid/461/view/topic/Default.aspx>

11/25/2008

Posts: 554
Houston, TX



[Send Email](#)
[Message](#)

14 Dec 2005 7:15 AM

Alert

Jeff, why don't we edit the above post and replace the text with a link to the press release file. That way it always stays "fresh" and won't contain errors such as the one above has (like jbrown@patriotguard.COM oops, that won't work) that may also continue to propagate if someone does a "cut'n paste".

Kurt "VenturaCowboy" Mayer
Public Relations, National Director (Retired)
Patriot Guard Riders

KDSFZV

"It ain't whatcha do but the way whatcha do it!"

Waldo ●
Posts: 1325
Windsor, Co
YOU CAN TALK
ABOUT US



**BUT YOU CAN'T
TALK WITHOUT US.**

[Send Email](#)
[Message](#)

14 Dec 2005 8:49 AM

Alert

the press release is now in the state capitan sop.

Jason Wallin "WALDO"
Deputy Executive Director
Corporate Treasurer
Patriot Guard Riders
970-402-1892

**American By Birth
Biker By Choice
Patriot Forever!**

Tact and Political Correctness were developed by those who lack the testicular fortitude to say what they really mean!

big100hd ●
Posts: 487
Loudoun County,
Virginia

25 Feb 2006 11:19 PM

Alert

Bump* Thanks Captain for helping me find it.

The patriot volunteer, fighting for country and his rights, makes the most reliable soldier on earth.

PGR 006716

<http://www.patriotguard.org/ALLForums/tabid/61/forumid/196/postid/461/view/topic/Default.aspx>

11/25/2008

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 25

Patriot Guard Riders

Wednesday, December 28,
2005

...: Home ...:

Search

Register Login

Navigation

Home

Our Mission

Our History

Photo Gallery

State Captains/Contact

We Get Letters...

Mission Ride Report

Media

Forums

PGR Store

Links

Member Map

UsersOnline

Membership:

Latest: ctmrun

New Today: 100

New Yesterday: 35

Overall: 3068

People Online:

Visitors: 114

Members: 21

Total: 135

Online Now:

01: Waldo

02: Twister

03: Tuisaduo

04: Spongebob

BECOME A PATRIOT GUARD RIDER



JOIN TODAY
FOR FULL SITE ACCESS
CLICK HERE

Freedom Isn't Free, But Membership Is



Welcome

Patriot Guard Riders Mission Statement

The Patriot Guard Riders is a diverse amalgamation of riders from across the nation. We have one thing in common besides motorcycles. We have an unwavering respect for those who risk their very lives for America's freedom and security. If you share this respect, please join us.

We don't care what you ride, what your political views are, or whether you're a "hawk" or a "dove". It is not a requirement that you be a veteran. It doesn't matter where you're from or what your income is. You don't even have to ride. The only prerequisite is Respect.

Our main mission is to attend the funeral services of fallen American heroes as invited guests of the family. Each mission we undertake has two basic objectives.

1. Show our sincere respect for our fallen heroes, their families, and their communities.
2. Shield the mourning family and friends from interruptions created by any protestor or group of protestors.

Missions

Confirmed Missions

Sgt. Myla L. Maravillosa, 24, of
Wahiawa, Hawaii
MISSION COMPLETE -- Lance Cpl.
Samuel Tapia, 20, of San Benito,
Texas -- 26 Dec 05
MISSION COMPLETE -- Spc
Joseph A. Lucas, 23, of Augusta
Georgia -- 27 Dec 05
Sgt. 1st Class John D. Morton, 31,
of Stanton, Ky -- 31 Dec 05
Sgt. Brian C. Karim, 22, of Talcott,
W. Va. -- 27 Dec 05
Staff Sgt. Curtis A. Mitchell,
McConnelsville, OH -- 29 Dec 05
Sgt. 1st Class James S. Moudy,
37, of Newark, Del -- 28 Dec 05

Watch List

Spc Sergio Gudino, 22, of
Pomona, Calif
Spc. Anthony O. Cardinal, 20, of
Muskegon, Mich
Master Sgt. Joseph J. Andres, Jr.,
34, of Seven Hills, Ohio
Spc. Cherylene C. Willey, 36, of
Fremont, Calif.
Sgt. Regina C. Reali, 25, of
Fresno, Calif.
Spc. William Lopez-Feliciano, 33,
of Quebradillas, Puerto Rico
1st Lt. Benjamin T. Britt, 24, of
Wheeler, Texas

PGR 000091

05: RoadDust
 06: Otter
 07: Dino
 08: StarVet
 09: dswood
 10: cwayneb
 11: wisefare
 12: HIRanger
 13: misarose
 14: jbgrewarrior
 15: Odoacer
 16: mscret
 17: shortcut
 18: chums
 19: y2k king
 20: Mikesgal
 21: comtun

We accomplish the latter through strictly legal and non-violent means.

Directly above is the Patriot Guard Riders' Mission Statement.

Please read it. If you don't agree with it, please don't join. If you're looking for a group that protests, counter-protests or confronts any organization, you're in the wrong place.

The PGR is not a protest group.

How to get the most from the Patriot Guard Riders website.

New Members

On the left side, you'll see the Navigation Window. This will take you anywhere you need to go. As a member, you should pay particular attention to the Forums. There are various forums in which you can find a lot of information. Most of these forums are open to all members. A few are open only to State and Ride Captains. These are for organizational issues.

To keep updated on Mission Rides in your area, the PGR Watch List and Confirmed Mission Rides are of particular importance.

All new KIAs (Killed In Action) are listed in the Watch List. Once we are notified of a death, the preliminary information is listed in this forum and the State Captain begins work to establish a Mission Ride for that soldier. As members gather more information, it will be posted in this forum. In the main subject line, you will see the soldier's name, rank, age, and hometown and state. This makes it easier for members to be able to see at a glance if a ride is in their area. Don't just look at your state; there may be a mission in a neighboring state that is nearby. If you click on the post, you will be able to read all the information and add your comments. At the top of the thread you will find a little box you can check that says:

☐ Email me when someone replies to this thread

If you check that box, you will automatically receive an email each time an additional post is added to the thread. This is the best way to keep updated on the progress of a particular mission.

Once the SC has made contact with the family or their designated spokesperson and received their permission, the mission ride has been confirmed and the entire thread is moved to the PGR Confirmed Mission Rides. This is where detailed plans for the mission Rides are posted. Here you can track the progress and find ride staging areas and times, who's planning on making the mission, etc. Again, you can check the box to automatically receive updates.

If you'd like to support the PGR and our missions further, click on the Paid Ads frequently and purchase items you want from the PGR Store.

Thanks for your support!

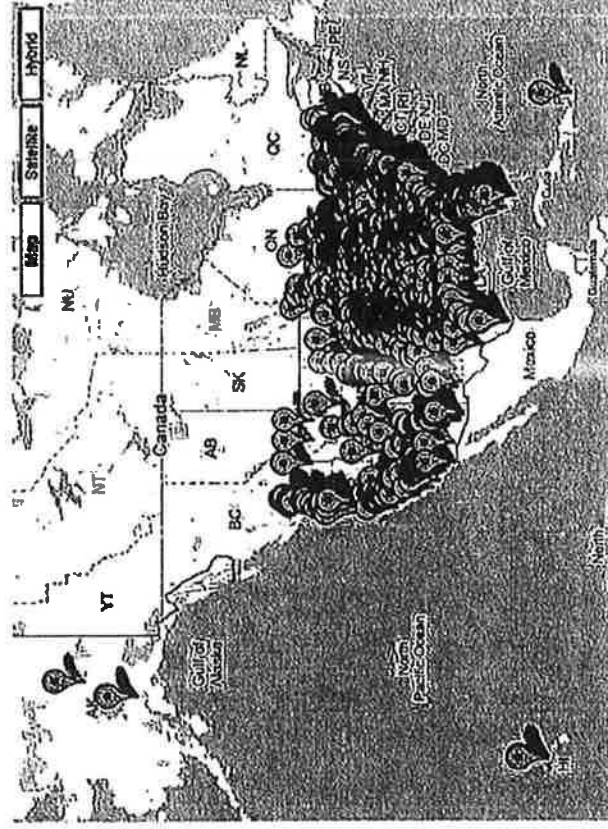
PGR 000092



Where are our members are

I plotted our total membership as of 1700 hours 12 Dec 05
this is what it looks like.

It looks like we are officially nation wide.



PGR 000093

Announcements

WE NEED STATE CAPTAINS & RIDE CAPTAINS

Hey Folks,

We still need volunteers for State Captains in a few states. If you can fill a position, please drop me a line.

Check the "State Captains/Contact" area to see what states are in need of a captain. If a state already has a Captain, most are recruiting Ride Captains to assist them. If you would like to be considered for a Ride Captain position, contact your State Captain directly.

Thanks,

Jeff

jbrown@patriotguard.org

WHAT CAN YOU DO???? - Saturday, November 19, 2005

If you are a member of, or know a member of, any other rider organization (AL, VFW, CV, HOGS, etc.), PLEASE "Copy & Paste" the Forum's "Watch List" and get it out to the members of the group. Especially make sure it gets to your members in states without a PGR State Captain. Follow up and ask them to email PGR if they want to "Ride the Mission". We need to start making an impact on the "orphan" states to honor these soldiers.

Folks, this is not just important...

It's what we do!



Copyright © 2005 by Patriot Guard Riders Terms Of Use Privacy Statement
DotNetNuke® is copyright 2002-2005 by Perpetual Motion Interactive Systems Inc.

PGR 000094

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 26

Patriot Guard Riders

Friday, December 30, 2005

... Home ...

Search

Register Login

Navigation

Home

Our Mission

Our History

Photo Gallery

State Captains/Contact

We Get Letters...

Mission Ride Report

Media

Forums

PGR Store

Links

Member Map

BECOME A PATRIOT GUARD RIDER



JOIN TODAY
FOR FULL SITE ACCESS
CLICK HERE

Freedom Isn't Free, But Membership Is



Welcome

Patriot Guard Riders Mission Statement

The Patriot Guard Riders is a diverse amalgamation of riders from across the nation. We have one thing in common besides motorcycles. We have an unwavering respect for those who risk their very lives for America's freedom and security. If you share this respect, please join us.

We don't care what you ride, what your political views are, or whether you're a "hawk" or a "dove". It is not a requirement that you be a veteran. It doesn't matter where you're from or what your income is. You don't even have to ride. The only prerequisite is Respect.

Our main mission is to attend the funeral services of fallen American heroes as invited guests of the family. Each mission we undertake has two basic objectives.

1. Show our sincere respect for our fallen heroes, their families, and their communities.
2. Shield the mourning family and friends from interruptions created by any protestor or group of protestors.

Missions

Confirmed Missions

Sgt. Myla L. Maravillosa, 24, of Wahiawa, Hawaii -- 31 Dec 05
1st Lt. Benjamin T. Britt, 24, of Wheeler, Texas -- 02 Jan 06
MISSION COMPLETE -- Lance Cpl. Samuel Tapia, 20, of San Benito, Texas -- 26 Dec 05
MISSION COMPLETE -- Spc Joseph A. Lucas, 23, of Augusta Georgia -- 27 Dec 05
Sgt. 1st Class John D. Morton, 31, of Stanton, Ky -- 31 Dec 05
Sgt. Brian C. Karim, 22, of Talcott, W. Va. -- 27 Dec 05
Staff Sgt. Curtis A. Mitchell, McConnellsville, OH -- 29 Dec 05
Sgt. 1st Class James S. Moudy, 37, of Newark, Del -- 28 Dec 05
Sgt. Coles currently in Missouri
1st Sgt. Tobias C. Meister, 30, of Jenks, Okla.
Pfc. Jason D. Hasenauer, 21, of Hilton, N.Y.
Pvt. Joshua M. Morberg, 20, of Sparks, Nev.
Spc. Lance S. Sage, 26, of Hempstead, N.Y.
Spc Sergio Gudino... Pomona California
Chief Warrant Officer Isaias E. Santos, 28, of Arcon, Panama.

Watch List

Sgt. Coles currently in Missouri
1st Sgt. Tobias C. Meister, 30, of Jenks, Okla.
Pfc. Jason D. Hasenauer, 21, of Hilton, N.Y.
Pvt. Joshua M. Morberg, 20, of Sparks, Nev.
Spc. Lance S. Sage, 26, of Hempstead, N.Y.
Spc Sergio Gudino... Pomona California
Chief Warrant Officer Isaias E. Santos, 28, of Arcon, Panama.

PGR 000095



We accomplish the latter through strictly legal and non-violent means.

Directly above is the Patriot Guard Riders' Mission Statement.

Please read it. If you don't agree with it, please don't join. If you're looking for a group that protests, counter-protests or confronts any organization, you're in the wrong place.

The PGR is not a protest group.

How to get the most from the Patriot Guard Riders website.

New Members

On the left side, you'll see the **Navigation Window**. This will take you anywhere you need to go. As a member, you should pay particular attention to the **Forums**. There are various forums in which you can find a lot of information. Most of these forums are open to all members. A few are open only to State and Ride Captains. These are for organizational issues.

To keep updated on Mission Rides in your area, the **PGR Watch List** and **Confirmed Mission Rides** are of particular importance.

All new KIAs (Killed In Action) are listed in the **Watch List**. Once we are notified of a death, the preliminary information is listed in this forum and the State Captain begins work to establish a Mission Ride for that soldier. As members gather more information, it will be posted in this forum. In the main subject line, you will see the soldier's name, rank, age, and hometown and state. This makes it easier for members to be able to see at a glance if a ride is in their area. Don't just look at your state; there may be a mission in a neighboring state that is nearby. If you click on the post, you will be able to read all the information and add your comments. At the top of the thread you will find a little box you can check that says:

☐ Email me when someone replies to this thread

If you check that box, you will automatically receive an email each time an additional post is added to the thread. This is the best way to keep updated on the progress of a particular mission.

Once the SC has made contact with the family or their designated spokesperson and received their permission, the mission ride has been confirmed and the entire thread is moved to the PGR Confirmed Mission Rides. This is where detailed plans for the mission Rides are posted. Here you can track the progress and find ride staging areas and times, who's planning on making the mission, etc. Again, you can check the box to automatically receive updates.

If you'd like to support the PGR and our missions further, click on the **Paid Ads** frequently and purchase items you want from the **PGR Store**.

Thanks for your support!

Chief Warrant Officer Richard M. Salter, 44, of Cypress, Texas.
Sgt. Dominic R. Coles, 25, of Jesup, GA
Spc. Dane O. Carver, 20, of Freeport, Mich
Spc. Sergio Gudino, 22, of Pomona, Calif
Spc. Anthony O. Cardinal, 20, of Muskegon, Mich
Master Sgt. Joseph J. Andres, Jr., 34, of Seven Hills, Ohio
Spc. Chyenne C. Willey, 36, of Fremont, Calif.
Sgt. Regina C. Reali, 25, of Fresno, Calif.
Spc. William Lopez-Feliciano, 33, of Quebradillas, Puerto Rico
Spc. Richard Junior D. Naputi, 24, of Talofofo, Guam
1st Lt. Michael J. Cleary, 24, of Dallas, Pa.
Cpl Adam Fales, 21 - Fairview (Cullman Co.), AL
Staff Sgt. Michael S. Zyla, 32, of Elgin, Ore. & Wheat Ridge, CO -- 27 Dec 05
Sgt. Kenneth Casica, 32, of Virginia Beach, Va.
Corporal Anthony McElveen Services
Pfc. Thomas C. Siekert, 20, of Lovelock, Nev



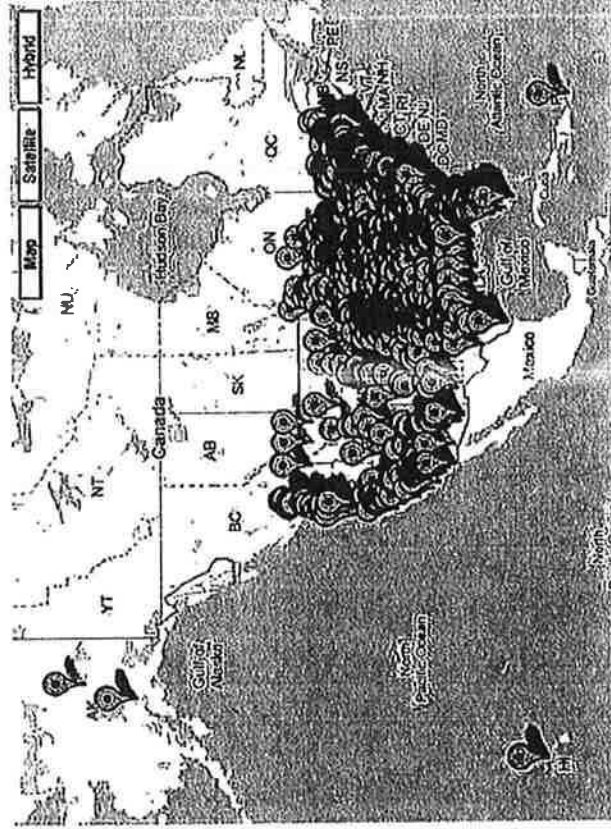
PGR 000096



Where are our members are

I plotted our total membership as of 1700 hours 12 Dec 05
this is what it looks like.

It looks like we are officially nation wide.



PGR 000097

Announcements

WE NEED STATE CAPTAINS & RIDE CAPTAINS

Hey Folks,

We still need volunteers for State Captains in a few states. If you can fill a position, please drop me a line.

Check the "State Captains/Contact" area to see what states are in need of a captain. If a state already has a Captain, most are recruiting Ride Captains to assist them. If you would like to be considered for a Ride Captain position, contact your State Captain directly.

Thanks,

Jeff

jbrown@patriotguard.org

WHAT CAN YOU DO??? - Saturday, November 19, 2005

If you are a member of, or know a member of, any other rider organization (AL, VFW, CV, HOGS, etc.), PLEASE "Copy & Paste" the Forum's "Watch List" and get it out to the members of the group. Especially make sure it gets to your members in states without a PGR State Captain. Follow up and ask them to email PGR if they want to "Ride the Mission". We need to start making an impact on the "orphan" states to honor these soldiers.

Folks, this is not just important...

It's what we do!



Copyright © 2005 by Patriot Guard Riders Terms Of Use Privacy Statement
DdnNuke® is copyright 2002-2005 by Perpetual Motion Interactive Systems Inc.

PGR 000098

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 27

Patriot Guard Riders

Tuesday, January 10, 2006

Navigation

- *Home
- Our Mission
- Our History
- Photo Gallery
- State Captains/Contact
- We Get Letters...
- Mission Ride Report
- Media
- Forums
- PGR Store
- Links
- Member Map

UsersOnline

- Memberships:
- Latest:
- NMumbleweed
- New Today: 106
- New Yesterday: 82
- Overall: 3939

- People Online:
- Visitors: 8
- Members: 6
- Total: 14

Online Now:
01: Rough Rider
02: gilbertnl

[Home](#) ::...

BECOME A PATRIOT GUARD RIDER

**JOIN TODAY
FOR FULL SITE
ACCESS**

[CLICK HERE](#)

Freedom Isn't Free, But Membership Is

Welcome

Patriot Guard Riders Mission Statement

The Patriot Guard Riders is a diverse amalgamation of riders from across the nation. We have one thing in common besides motorcycles. We have an unwavering respect for those who risk their very lives for America's freedom and security. If you share this respect, please join us.

We don't care what you ride, what your political views are, or whether you're a "hawk" or a "dove". It is not a requirement that you be a veteran. It doesn't matter where you're from or what your income is. You don't even have to ride. The only prerequisite is Respect.

Our main mission is to attend the funeral services of fallen American heroes as invited guests of the family. Each mission we undertake has two basic objectives.

1. **Show our sincere respect for our fallen heroes, their families, and their communities.**
2. Shield the mourning family and friends from interruptions created by any protestor or group of protestors.

Missions

Confirmed Missions

MISSION COMPLETE --
Staff Sgt. Christopher J. Van
Der Horn, 37, Memorial
Service in Clarksville, TN --
07 Jan 06

Sgt. 1st Class Jason L.
Bishop, 31, of
Williamstown, Ky -- 14 Jan
06 1100 hours

Spc. Prince K. Teewia, 27,
of Durham, N.C./Newark,
DE -- 13 Jan 06

Staff Sgt. Christopher J. Van
Der Horn, 37, of Bellevue,
WA -- 12 Jan 06

Pvt. Jonathan R. Pfender,
22, of Evansville, Ind -- 10
Jan 06

MISSION COMPLETE --
1st Sgt. Tobias C. Meister,
30, of Jenks, Okla. -- 06 Jan
06

MISSION COMPLETE --
Pfc. Jason D. Hasenauer, 21,
of Hilton, N.Y. -- 07 Jan 06

MISSION COMPLETE --
Chief Warrant Officer
Richard M. Salter, 44, of
Cypress, Texas/Killeen,
Texas -- 06 Jan 06

PGR 000099

03: stuka
04: Joe3262
05: BelgianArmy
06: ALRSmiley

We accomplish the latter through strictly legal and non-violent means.

Directly above is the Patriot Guard Riders' Mission Statement.

Please read it. If you don't agree with it, please don't join. If you're looking for a group that protests, counter-protests or confronts any organization, you're in the wrong place.

The PGR is not a protest group.

How to get the most from the Patriot Guard Riders website.

New Members

On the left side, you'll see the **Navigation Window**. This will take you anywhere you need to go. As a member, you should pay particular attention to the Forums. There are various forums in which you can find a lot of information. Most of these forums are open to all members. A few are open only to State and Ride Captains. These are for organizational issues.

To keep updated on Mission Rides in your area, the **PGR Watch List** and **Confirmed Mission Rides** are of particular importance.

All new KIAs (Killed In Action) are listed in the Watch List. Once we are notified of a death, the preliminary information is listed in this forum and the State Captain begins work to establish a Mission Ride for that soldier. As members gather more information, it will be posted in this forum. In the main subject line, you will see the soldier's name, rank, age, and hometown and state. This makes it easier for members to be able to see at a glance if a ride is in their area. Don't just look at your state; there may be a mission in a neighboring state that is nearby. If you click on the post, you will be able to read all the information and add your comments. At the top of the thread you will find a little box you can check that says:

☐ Email me when someone replies to this thread

Sgt. Dominic R. Coles, 25,
of Jesup, GA -- 10 Jan 06
MISSION COMPLETE --
Spc. Sergio Gudino, 22, of
Pomona, Calif -- 07 Jan 06
Watch List
Adam Cann, Davie, Florida
Spc. Robert T. Johnson, 20,
of Erwin, N.C.
Sgt. Nathan R. Field, 23, of
Lehigh, Iowa
Lance Cpl. Ryan S.
McCurdy, 20, of Baton
Rouge, La.
Cpl. Albert P. Gettings, 27,
of New Castle, Pa.
Sgt. Adam L. Cann, 23, of
Davie, Fla.
12 killed in Blackhawk crash
Lt. Col. Michael E.
McLaughlin, 44, of Mercer,
Pa
Spc. Ryan D. Walker, 25, of
Stavton, Ore.
Sgt. Jason Lopezreyes, 29,
of Hatillo, Puerto Rico.
Pvt. Robbie M. Mariano, 21,
of Stockton, Calif.
Sgt. Johnny J. Perez, Jr.,
25, of Kinesville, Texas.
Sgt. 1st Class Stephen J.
White, 39, of Talladega,
Ala.
Capt. Christopher P. Petty,
33, of Vienna, Va.

PGR 000100

If you check that box, you will automatically receive an email each time an additional post is added to the thread. This is the best way to keep updated on the progress of a particular mission.

Once the SC has made contact with the family or their designated spokesperson and received their permission, the mission ride has been confirmed and the entire thread is moved to the PGR Confirmed Mission Rides. This is where detailed plans for the mission Rides are posted. Here you can track the progress and find ride staging areas and times, who's planning on making the mission, etc. Again, you can check the box to automatically receive updates.

If you'd like to support the PGR and our missions further, click on the **Paid Ads** frequently and purchase items you want from the **PGR Store**.

Thanks for your support!

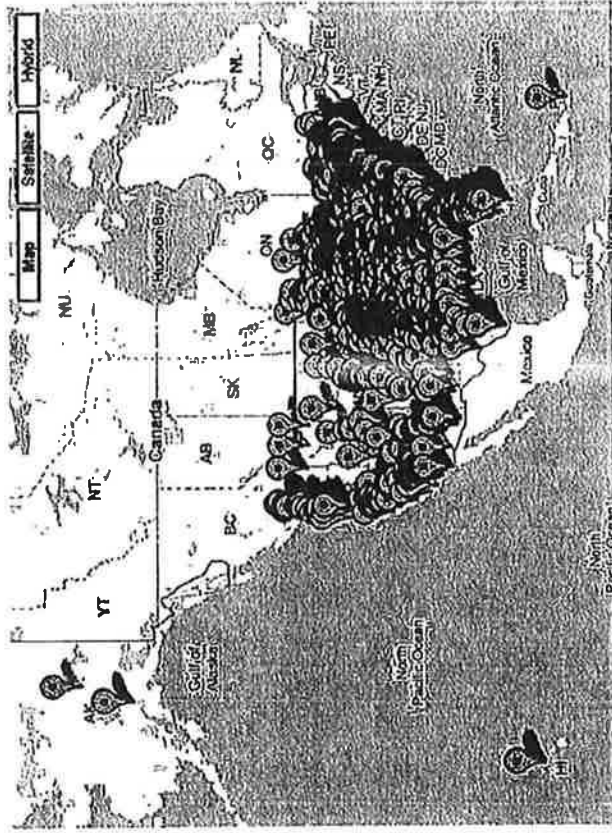
Where are our members are

I plotted our total membership as of 1700 hours 12 Dec 05
this is what it looks like.

It looks like we are officially nation wide.

Mai, William F. Hecker, III,
37. of St. Louis, Mo
Sgt. 1st Class Shawn C.
Dostie, 32. of Granite City,
Ill./ Lewistown, Maine
Staff Sgt. Aymen A. Taha,
31. of Vienna, Va
Spc. Marcelino R. Corniel,
23. of La Puente, Calif
Chief Warrant Officer Isaias
E. Santos, 28. of Ancon,
Panama.
Master Sgt. Joseph J.
Andres, Jr., 34. of Seven
Hills, Ohio
Spc. William
Lopez-Feliciano, 33. of
Quebradillas, Puerto Rico
Spc. Richard Junior D.
Naputi, 24. of Talofofo,
Guam
Cpl Adam Fales, 21 -
Fairview (Culman Co.), AL
Corporal Anthony McElveen,
Services
Pfc. Thomas C. Siekert, 20,
of Lovelock, Nev

PGR 000101



Announcements

WE NEED STATE CAPTAINS & RIDE CAPTAINS

Hey Folks,

We still need volunteers for State Captains in a few states. If you can fill a position, please drop me a line.

Check the "State Captains/Contact" area to see what states are in need of a captain. If a state already has a Captain, most are recruiting Ride Captains to assist them. If you would like to be considered for a Ride Captain position, contact your State Captain directly.

PGR 000102

Thanks,
Jeff
jbrown@patriotguard.org

WHAT CAN YOU DO??? - Saturday, November 19, 2005

If you are a member of, or know a member of, any other rider organization (AL, VFW, CV, HOGS, etc.), PLEASE "Copy & Paste" the Forum's "Watch List" and get it out to the members of the group. Especially make sure it gets to your members in states without a PGR State Captain. Follow up and ask them to email PGR if they want to "Ride the Mission". We need to start making an impact on the "orphan" states to honor these soldiers.

Folks, this is not just important...

It's what we do!

Copyright © 2005 by Patriot Guard Riders Terms Of Use Privacy Statement
OutNetNuke® is copyright 2002-2004 by Perpetual Motion Interactive Systems Inc.

PGR 000103

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 28

Patriot Guard Riders

Saturday, April 08, 2006

Navigation

- [*Home](#)
- [Our Mission](#)
- [Our History](#)
- [Photo Gallery](#)
- [State Captains/Contact](#)
- [We Get Letters...](#)
- [PGR in the Media](#)
- [Forums](#)
- [PGR Store](#)
- [Links](#)
- [Who Rides With Us](#)
- [PGR Announcements](#)
- [Gathering of the Guard](#)

Jeff's
Corner

Minimize

"IT'S NOT ABOUT US..."

Invariably, "it's not about us" comes up in various posts throughout the PGR site when something is mentioned that is some view as promoting the PGR.

...: Home ...

BECOME A PATRIOT GUARD RIDER

Minimize

• wavingflag

JOIN TODAY
FOR FULL SITE
ACCESS
CLICK HERE

• wavingflag

Freedom Isn't Free, But Membership Is

Thank You America

Minimize

Thank you for your overwhelming support! If you would like some more information about our organization or you are wondering what you can do to help us honor Americas Heroes, please email - info@patriotguard.org.

**We will get back to you as soon as we can.
Jason, Jeff, Kurt & the entire PGR family.**

The new Online PGR Store is now up and running.

If you click on the PGR Store link from the web site, it should take you there, or you can go there directly at www.patriotguardstore.org

It may take a little tweaking to get things absolutely perfect, but it seems to be working great. Items in stock are actually being shipped in less than three days. In order to speed up all new orders and back orders and reduce processing errors, we need to ask for your assistance.

Search

Register Login

Missions

Minimize

Confirmed Missions

PLEASE READ BEFORE POSTING

ITINERARY

UPDATE--LEO Ronnie

Harlowe Jr. of Houston

Countv. GA-- 08 Apr 06

CPL Avron Christopher

Kull. 23. of Niles, MI -- 08

Apr 06

Vietnam Veteran Cloyde

Pinson Jr., Dallas, TX -- 12

Apr 06

Korean War Vet-Hubert

Thomas Elders, Nashville,

TN-- 12 Apr 06

ITINERARY UPDATE

-- Viet Nam Veteran.

Mitchell David Meyers of

Trenton Ohio. April 08

ITINERARY

UPDATE--Cpl David C

Baker - WWII Vet - Ft

Gibson. OK-- 10 Apr 06

Sgt. Matt Maupin, OIF

POW Vjgil, Morrison. CO 9

April 05

Cpl. Andres Aguilar Jr., 21,

of Victoria, Texas

Sgt. Israel Devora Garcia,

23. of Clint, Texas

PGR 000104

If you have placed an order and not yet submitted payment, please resubmit the order on the new PGR store... This will save us wading through thousands of emails and will speed up the order processing and shipping tremendously.

If you have already paid for your invoice, please hang in there, we're working to get everything caught up.

If you have questions about an order, please go to <http://www.patriotguardstore.org/contact.asp> and submit them.

Thanks again for all your support, patience and understanding.

Sincerely,
PGR Store

Media News Flash: ABC's Good Morning America did a very special story on a recent mission to honor Sgt. Gordon F. Misner, II in Colorado Springs, CO. It aired this Monday morning -- March 20th -- as part of ABC News' division-wide special coverage on the Iraq War.

In case you missed it, click here:
[ABC's Good Morning America segment on PGR](#)

For Press & Media Requests... Please send an email to
media@patriotguard.org.

Thanks!
Kurt Mayer, National Public Relations Director

UsersOnline [Minimize](#)

- Membership:
- Latest: Trick
- New Today: 180
- New Yesterday: 216
- Overall: 23066

- People Online:
- Visitors: 694
- Members: 237
- Total: 931

Online Now [Minimize](#)

- Online Now:
- 01deuce : [Forums](#)
- 03Springer : [Forums](#)
- 82nd_Airborne_Dad : [Forums](#)
- alaskancoppertop : [Home](#)
- albert5001 : [Home](#)
- albruner : [Forums](#)
- ALRTater : [Forums](#)
- BAIR : [Forums](#)
- balzabustn : [Forums](#)
- bamabiker1 : [Forums](#)
- Bassman : [Home](#)
- bbrandolino : [Home](#)

Welcome

[Minimize](#)

Patriot Guard Riders Mission Statement

The Patriot Guard Riders is a diverse amalgamation of riders from across the nation. We have one thing in common besides motorcycles. We have an unwavering respect for those who risk their very lives for America's freedom and security. If you

ITINERARY

UPDATE--Staff Sgt. Eric A. McIntosh, 29, of Trafford, Pa./FT Myer, VA -- 11 April 06

MISSION

COMPLETE--Lance Cpl. Jacob W. Beisel, 21, of Lackawaxen, Pa.-- 07 Apr 06

Chief Warrant Officer 3 Michael L. Hartwick, of Orrick, Mo.

MISSION

COMPLETE--SFC Kenneth Ford Brooks WW II and Korea, Birmingham, AL-- 06 Apr 06

ITINERARY

UPDATE--Cpl. Brian St. Germain, 22, West Warwick, RI-- 12 Apr 06

ITINERARY

UPDATE--CPL Scott Procopio, 20, Saugus, MA-- 11 Apr 06

Sgt Bill McGuinness, USMC Vietnam, Livermore, CA -- 08 Apr 06

MISSION

COMPLETE--DESERT STORM VET AND SHERIFF'S DEPUTY OFFICER DONALD PILKINTON, 50, Lawrenceburg, TN-- 06 Apr 06

Pfc. Jeremy W. Ehle, 19, of Richmond, Va/Alexandria

PGR 000105

- Bear : [Home](#)
 - buggins : [Forums](#)
 - big100hd : [Members List](#)
 - Bikergal : [Who Rides With Us](#)
 - bikermom800 : [Home](#)
 - BIX : [Who Rides With Us](#)
 - Bluwing : [Forums](#)
 - BMC_Rider : [Forums](#)
 - Bob Olds : [Forums](#)
 - bobnac : [PGR Store](#)
 - BrandonH : [Forums](#)
 - Bree : [Forums](#)
 - bubba : [Home](#)
 - buff676 : [Forums](#)
 - Bullkat : [Home](#)
 - butchtnny@aol.com : [Forums](#)
 - C A N B : [Forums](#)
 - Capt. Morgan : [Forums](#)
 - caretaker : [Home](#)
 - chadrh : [Forums](#)
 - CHARGERLEW : [Home](#)
 - ChattanoogaFatboy : [Home](#)
 - Cheesehead : [Home](#)
 - Chief_Investigator : [Forums](#)
 - chorusgurl : [Forums](#)
 - Chuck-Stewart : [Home](#)
 - CmdrRob : [announcements](#)
 - coals15 : [Home](#)
 - Copperblaze : [Forums](#)
 - crich20058 : [PGR](#)
- [Announcements](#)
- crooked : [Home](#)
 - Daddo : [Forums](#)
 - DaGrunt : [PGR in the Media](#)
 - DarkLord : [PGR in the Media](#)
 - deltoid79 : [Forums](#)
 - descott : [Forums](#)
 - DevilDog060407 : [Home](#)

share this respect, please join us.

We don't care what you ride, what your political views are, or whether you're a "hawk" or a "dove". It is not a requirement that you be a veteran. It doesn't matter where you're from or what your income is. You don't even have to ride. The only prerequisite is Respect.

Our main mission is to attend the funeral services of fallen American heroes as invited guests of the family. Each mission we undertake has two basic objectives.

1. Show our sincere respect for our fallen heroes, their families, and their communities.

2. Shield the mourning family and friends from interruptions created by any protestor or group of protestors.

We accomplish the latter through strictly legal and non-violent means.

Directly above is the Patriot Guard Riders' Mission Statement.

Please read it. If you don't agree with it, please don't join. If you're looking for a group that protests, counter-protests or confronts any organization, you're in the wrong place.

The PGR is not a protest group.

How to get the most from the Patriot Guard Riders website.

New Members

On the left side, you'll see the **Navigation Window**. This will take you anywhere you need to go. As a member, you should pay particular attention to the Forums. There are various forums in which you can find a lot of information. Most of these forums are open to all members. A few are open only to State and Ride Captains. These are for organizational issues.

- VA-- 12 April 06
- LCPL NICHOLAS J.
- SOVIE, Ogdensburg.
- NY--25 May 06
- MISSION
- COMPLETE--Pfc. Sean D.
- Tharp. 21. of Orlando, Fla.--
- 06 Apr 06
- Tech. Sgt. Walter M. Moss
- Jr., 37. of Houston, Texas
- WWII Vet - Robert Raney,
- Monon, IN-- 08 Apr 06
- MISSION
- COMPLETE--Sgt. Michael
- D. Rowe, 23, New Port
- Richey, Fla. -- 07 Apr 06
- ITINERARY UPDATE
- CPL Antoine J. McKinzie,
- 25. of Indianapolis, Ind.-- 11
- Apr 06
- Vietnam MIA Col. Eugene
- D. Hamilton of Opelika, AL
- Arlington National
- Cemetery- 26 Jun 06
- ITINERARY
- UPDATE--Tech. Sgt.
- Patrick L. Shannon -
- Oklahoma City - Vietnam--
- 15 Apr 06
- Watch List
- PLEASE READ BEFORE
- POSTING
- Spc. Daniel L. Sesker, 22. of
- Ogden, Iowa
- Spc. Dustin J. Harris, 21. of
- Bangor, Maine

PGR 000106

- [Dinky Dau : Forums](#)
- [dnelson457 : Forums](#)
- [Doughie : Forums](#)
- [drnickelsen : Forums](#)
- [dsj30c : Forums](#)
- [dssamp : Forums](#)
- [dubree : Forums](#)
- [dynagc : Home](#)
- [eagle : Forums](#)
- [eagleman : Forums](#)
- [Elaine : Forums](#)
- [elsie13e : Forums](#)
- [escortbike : Home](#)
- [esna : Home](#)
- [fatboytm : State Captains/Contact](#)
- [Fatstripe : Forums](#)
- [FIREDOG89 : Forums](#)
- [flig_chris : Forums](#)
- [formula414 : PGR Announcements](#)
- [freedomfiter : Home](#)
- [FreestateXL : announcements](#)
- [fruit loop : Forums](#)
- [gabel : Forums](#)
- [georges : Home](#)
- [Goobtoo : Home](#)
- [GoodGreg : Forums](#)
- [Grilla : Forums](#)
- [Grissofire : Forums](#)
- [Grizzly_Mike : Forums](#)
- [gruntSGT : Forums](#)
- [gui_tarzan : Forums](#)
- [GutWrench : Home](#)
- [halfbubble : Who Rides With Us](#)
- [Hammer of God : Forums](#)
- [HarleyD : Most Recent Posts](#)

To keep updated on Mission Rides in your area, the **PGR Watch List** and **Confirmed Mission Rides** are of particular importance.

All new KIAs (Killed In Action) are listed in the Watch List. Once we are notified of a death, the preliminary information is listed in this forum and the State Captain begins work to establish a Mission Ride for that soldier. As members gather more information, it will be posted in this forum.

In the main subject line, you will see the soldier's name, rank, age, and hometown and state. This makes it easier for members to be able to see at a glance if a ride is in their area. Don't just look at your state; there may be a mission in a neighboring state that is nearby. If you click on the post, you will be able to read all the information and add your comments. At the top of the thread you will find a little box you can check that says:

☐ Email me when someone replies to this thread

If you check that box, you will automatically receive an email each time an additional post is added to the thread. This is the best and fastest way to keep updated on the progress of a particular mission.

Please do not contact your State Captain asking them to email you with updates. As a PGR member, it is your responsibility to keep abreast of mission rides in your area. Your SC simply does not have the time to do this.

Once the SC has made contact with the family or their designated spokesperson and received their permission, the mission ride has been confirmed and the entire thread is moved to the PGR Confirmed Mission Rides. This is where detailed plans for the mission Rides are posted. Here you can track the progress and find ride staging areas and times, who's planning on making the mission, etc. Again, you can check the box to automatically receive updates.

If you'd like to support the PGR and our missions further, click on the **Paid Ads** frequently and purchase items you want from the **PGR Store**.

[LCpl. Bryan Taylor, USMC, Clermont County/Miami Township, OH](#)
[Pfc. Chase A. Edwards, 19, of Lake Charles, La.](#)
[Spc. Ty J. Johnson, 28, of Elk Grove, Calif/Utah](#)
[Staff Sgt. Abraham G. Twitchell, 28, of Yelm, Wash.](#)
[Lance Cpl. Felipe D. Sandoval-Flores, 20, of Los Angeles, Calif.](#)
[Lance Cpl. Patrick J. Gallagher, 27, of Jacksonville, Fla./Fairhaven, MA](#)
[Family Only Service- Cpl. David A. Bass, 20, of Nashville, Tenn.](#)
[Staff Sgt. Darrell P. Clay, 34, of Fayetteville, N.C.](#)
[Lance Cpl. Kun Y. Kim, 20, of Atlanta, Ga.](#)
[Capt. Timothy J. Moshier, 25, of Albany, N.Y.](#)
[Hospitalman Geovani Padillaaleman, 20, of South Gate, Calif.](#)
[Firefighter Captain Joe F. Prock, 52, Greenwood, La.](#)
[Pfc. Joseph J. Duenas, 23, of Ceres, CA/Oakland, CA](#)
[Sgt. 1st Class John T. Stone, 52, of Norwich, Vt.](#)

PGR 000107

Thanks for your support!

- [harly59g : Members List](#)
- [hdx2 : Forums](#)
- [highsalute : Forums](#)
- [HogDaddy : Forums](#)
- [Hope : Forums](#)
- [howerter1 : PGR in the Media](#)
- [huflung : Forums](#)
- [Hurricane : Forums](#)
- [ibridn : Forums](#)
- [IMCRUZIN2 : Forums](#)
- [indylt : Home](#)
- [indyharley : Forums](#)
- [ironcowboy : Forums](#)
- [Izzy : Forums](#)
- [janrick : Forums](#)
- [Javaman : Forums](#)
- [jdrahughes : Home](#)
- [jeffaren : Forums](#)
- [jeffz66 : Forums](#)
- [jercase : Home](#)
- [jgm854 : Forums](#)
- [jki659 : announcements](#)
- [joebasta : Home](#)
- [JohnnyW : Forums](#)
- [johnsierra : Home](#)
- [jtullis : PGR in the Media](#)
- [jwait : Home](#)
- [katwoodx2 : Home](#)
- [kball : Forums](#)
- [kgmall@aol.com : Forums](#)
- [klumberguy : Forums](#)
- [knerrell : Home](#)
- [Knobby : Forums](#)
- [kzohio : Members List](#)
- [Lakota Man : Forums](#)
- [larryrodgers : Forums](#)
- [lawsonmd : We Get Letters...](#)
- [LetsRoll : Home](#)

PGR 000108

- [\[-\] lilspitfire63 : Forums](#)
- [\[-\] lobo926 : Forums](#)
- [\[-\] lockdowntim : Home](#)
- [\[-\] londopro : Home](#)
- [\[-\] Lone_Hawk : Forums](#)
- [\[-\] Luckeey22 : Forums](#)
- [\[-\] LV74-04 : Home](#)
- [\[-\] LynnA : Forums](#)
- [\[-\] Magnet : Forums](#)
- [\[-\] Mama Dragon : Forums](#)
- [\[-\] matt478d : Forums](#)
- [\[-\] max1319 : Home](#)
- [\[-\] MC : Forums](#)
- [\[-\] melita : Forums](#)
- [\[-\] mikemagilla : Forums](#)
- [\[-\] Milbear : Forums](#)
- [\[-\] MJS : Forums](#)
- [\[-\] mommyoftwins : Home](#)
- [\[-\] Mr-Spike : Forums](#)
- [\[-\] MSGHAWKEYE : Home](#)
- [\[-\] MSGRET : Home](#)
- [\[-\] MsMaurader : Home](#)
- [\[-\] MsUncleBuck : Home](#)
- [\[-\] Murph H-D : Forums](#)
- [\[-\] nanabasic : Forums](#)
- [\[-\] NERoadking : anouncements](#)
- [\[-\] Nighthawk50 : Home](#)
- [\[-\] nikatam : Forums](#)
- [\[-\] NJ Hawk : Forums](#)
- [\[-\] NOBODY56 : PGR in the Media](#)
- [\[-\] NostalgiaBoy : Forums](#)
- [\[-\] okwhatnext : Forums](#)
- [\[-\] old corps : We Get Letters...](#)
- [\[-\] oldgoldstar : We Get Letters...](#)
- [\[-\] oneangrypatriot : Forums](#)
- [\[-\] Orion : Home](#)
- [\[-\] papagoom : We Get Letters...](#)

PGR 000109

[PARACHUTE : Home](#)
[pastorbillparker : Home](#)
[PDDGM : Forums](#)
[Pedrum : Forums](#)
[peepaw : Forums](#)
[Pepper_guy : Forums](#)
[pfgrenier : Forums](#)
[phedup : Forums](#)
[picasso : Forums](#)
[Pilotguy1050 : Forums](#)
[Pittman : Forums](#)
[pmbell64 : Forums](#)
[Poncho : Forums](#)
[Popcom : Home](#)
[PUB : Forums](#)
[qgolden : Forums](#)
[rasc49 : PGR Announcements](#)
[RFTWDave : Home](#)
[rheamer1 : Home](#)
[RingLord : Forums](#)
[Roading Warrior : Forums](#)
[Robby P : Forums](#)
[Rocky3 : Home](#)
[ronjulian : Forums](#)
[Ronson : Home](#)
[Rottendog93 : Forums](#)
[Rough Rider : Forums](#)
[rrawtry : Forums](#)
[rube : Forums](#)
[Russ : Forums](#)
[sckotg : Home](#)
[Scorpio USMV M/C : Forums](#)
[Scruit : Forums](#)
[seeker : Home](#)
[semicop : Forums](#)
[SilverBack : Forums](#)
[SlagHammer : Forums](#)
[slink : Forums](#)

PGR 000110

[Southern Reb : Forums](#)
[spiker592000 : Forums](#)
[Sportster : Members List](#)
[squirrel : Forums](#)
[Starfox : Forums](#)
[Steam : Home](#)
[stone : Forums](#)
[Streaker : Home](#)
[stretchnit : Home](#)
[Sugar1 : Forums](#)
[tankrthompson : Forums](#)
[TattooCaptain : Home](#)
[texas_angel1979 : Forums](#)
[Tgray : We Get Letters...](#)
[The Va Gambler : Forums](#)
[Tiki : Forums](#)
[tinman392 : Home](#)
[Towwizzard : Forums](#)
[Trick : Home](#)
[Twister : Forums](#)
[Uncle Tony : Forums](#)
[UncleBob : Forums](#)
[usasoldier88 : Home](#)
[vanillaman65 : Forums](#)
[Virgil : Forums](#)
[VTXinnix : Forums](#)
[vixri : Home](#)
[vulcan : Home](#)
[wagonguy : Home](#)
[Waitaminit : Home](#)
[Waldo : Forums](#)
[Wayne18 : Forums](#)
[willprevale : Forums](#)
[wilsondude : Forums](#)
[Winger_Ace : Forums](#)
[Wolfrunner25 : Home](#)
[woody0402 : announcements](#)
[wvhusker : Forums](#)

PGR 000111

[- ZOOMER : Home](#)
[- zydeconut : Forums](#)

Copyright © 2005 -2006 by Patriot Guard Riders [Terms Of Use](#) [Privacy Statement](#)

PGR 000112

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 29

Patriot Guard Riders

Saturday, April 15, 2006

Navigation

- *Home
- Our Mission
- Our History
- Photo Gallery
- State Captains/Contact
- We Get Letters...
- PGR in the Media
- Forums
- PGR Store
- Links
- Who Rides With Us
- PGR Announcements
- Gathering of the Guard

Jeff's
Corner

Minimize

"IT'S NOT ABOUT US..."

Invariably, "it's not about us" comes up in various posts throughout the PGR site when something is mentioned that is some view as promoting the PGR.

...: Home ...:

BECOME A PATRIOT GUARD RIDER

Minimize

- wavingflag

JOIN TODAY
FOR FULL SITE
ACCESS

CLICK HERE

Freedom Isn't Free, But Membership Is

- wavingflag

A Sad Day for the PGR

Minimize

Robert Lee Clark

Age 32

Died April 8th, 2006

- Bobby.jpg

We lost Bobby at 10:55pm on Saturday, April 8th, 2006. Bobby was killed when he struck a truck that failed to yield at a stop sign. The driver was legally intoxicated. Bobby was on the way back from Canon City to Colorado Springs so he could meet up with his VFW Warriors brothers and ride up to the vigil for Sgt Matt Maupin in

Search

Register Login

Missions

Minimize

Confirmed Missions

PLEASE READ BEFORE POSTING

- Memorial Service, Spc. Robert Lee Clark, 32, Army, FT Carson, CO - 21 Apr 06
- Itinerary-Confirmed Mission Lance Cpl. Phillip J. Martini 24 USMC of Lansing Illinois 19 Apr 06
- Sgt. 1st Class Randall L. Lamberson, 36, of Springfield, Mo.

ITINERARY

UPDATE--Cpl. Richard P. Waller, 22, of Fort Worth, Texas-- 17 Apr 06

ITINERARY

UPDATE--Spc. Robert Lee Clark, 32, Army, Gibsonburg, Ohio-- 18 Apr 06

Lance Cpl. Juana

NavarroArellano, 24, of

Ceres, Calif

Pfc. Jody Missildine, 19,

Plant City, Florida

Sgt. 1st Class Gregory S.

Rogers, 42, of Cincinnati,

Ohio

PGR 000113

Morrison, CO.

Bobby will be remembered for his kind smile, good nature and sense of humor.

Godspeed Brother, We love you and we miss you.

Please watch for updates in the confirmed missions for our ride to honor Bobby.

There will also be a memorial service at Soldiers Chapel on Fort Carson --- More details to follow

• Bobby.jpg

UsersOnline Minimize

- ☐ Membership:
- ☐ Latest: woodpimp
- ☐ New Today: 208
- ☐ New Yesterday: 272
- ☐ Overall: 24557

- ☐ People Online:
- ☐ Visitors: 456
- ☐ Members: 153
- ☐ Total: 609

Online Now

Welcome

Minimize

Minimize

Online Now:

- ☐ 135th-taipan : Home
- ☐ 1MileCrash : Forums
- ☐ 2wheeltood : Forums
- ☐ 308bbs : Forums
- ☐ Acemyth73 : Home
- ☐ AirAngel145 : Home
- ☐ armynominlaw : Forums
- ☐ bdr1977 : Forums
- ☐ BigUglyOne : Forums
- ☐ Biker Bob : Forums
- ☐ Biker Trash : Home
- ☐ birds nest : Home

Patriot Guard Riders Mission Statement

The Patriot Guard Riders is a diverse amalgamation of riders from across the nation. We have one thing in common besides motorcycles. We have an unwavering respect for those who risk their very lives for America's freedom and security. If you share this respect, please join us.

We don't care what you ride, what your political views are, or whether you're a "hawk" or a "dove". It is not a requirement that you be a veteran. It doesn't matter where you're from or what your income is. You don't even have to ride. The only prerequisite is Respect.

Our main mission is to attend the funeral services of fallen American heroes as invited guests of the family. Each mission we undertake has two basic objectives.

- ITINERARY
- UPDATE--Spc. Dustin J. Harris, 21, of Bangor, Maine - 15 Apr 06
- MISSION
- COMPLETE--LCpl. Bryan Taylor, USMC, Clermont County/Miami Township, OH-- 13 Apr 06
- MISSION
- COMPLETE--Pfc. Chase A. Edwards, 19, of Lake Charles, La.-- 14 Apr 06
- MISSION
- COMPLETE--Vietnam Veteran Cloyde Pinson Jr., Dallas, TX -- 12 Apr 06
- MISSION
- COMPLETE--Korean War Vet-Hubert Thomas Elders, Nashville, TN-- 12 Apr 06
- MISSION
- COMPLETE--Spc. Ty J. Johnson, 28, of Elk Grove, Calif/Utah-- 12 Apr 06
- ITINERARY
- UPDATE--Staff Sgt. Abraham G. Twitchell, 28, of Yelm, Wash. - 15 April 06
- MISSION
- COMPLETE--Lance Cpl. Patrick J. Gallagher, 27, of Jacksonville, Fla./Fairhaven, MA-- 14 Apr 06
- MISSION
- COMPLETE--Cpl. David A. Bass, 20, of Nashville, Tenn.-- 11 Apr 06

PGR 000114

- [blacksmith6sis : Home](#)
- [blkvstar02 : We Get Letters...](#)
- [Bodysnatcher : Forums](#)
- [BonRu : Forums](#)
- [Bub : Forums](#)
- [Catfish : Forums](#)
- [ccheck : Forums](#)
- [ccochran : Forums](#)
- [cduehring : Forums](#)
- [Charles DuFresne : Home](#)
- [Chief_Investigator : Forums](#)
- [chorusgurl : Forums](#)
- [cmfanelli : State Captains/Contact](#)
- [CPO : Forums](#)
- [crrforward : Forums](#)
- [dan t : Forums](#)
- [danrig : Forums](#)
- [daved350 : Forums](#)
- [Dazed : Forums](#)
- [deerpath : Home](#)
- [dk2onion : Home](#)
- [dmiller : Forums](#)
- [doghair : Forums](#)
- [E8MC : Forums](#)
- [Eagle1SG : Forums](#)
- [Fat Albert : Most Recent Posts](#)
- [Feets : Forums](#)
- [fly4bux : Forums](#)
- [FMailki : Forums](#)
- [fusc69 : Forums](#)
- [gailprp : Forums](#)
- [Gator : Forums](#)
- [gottagofarm : Forums](#)
- [GP_Paladin : Forums](#)
- [Great Dane : Forums](#)
- [GRNPAW : Forums](#)
- [Hammerfly : Forums](#)
- [hardrock : Forums](#)

1. Show our sincere respect for our fallen heroes, their families, and their communities.

2. Shield the mourning family and friends from interruptions created by any protestor or group of protestors.

We accomplish the latter through strictly legal and non-violent means.

Directly above is the Patriot Guard Riders' Mission Statement.

Please read it. If you don't agree with it, please don't join. If you're looking for a group that protests, counter-protests or confronts any organization, you're in the wrong place.

The PGR is not a protest group.

How to get the most from the Patriot Guard Riders website.

New Members

On the left side, you'll see the **Navigation Window**. This will take you anywhere you need to go. As a member, you should pay particular attention to the Forums. There are various forums in which you can find a lot of information. Most of these forums are open to all members. A few are open only to State and Ride Captains. These are for organizational issues.

To keep updated on Mission Rides in your area, the **PGR Watch List** and **Confirmed Mission Rides** are of particular importance.

All new KIAs (Killed In Action) are listed in the Watch List. Once we are notified of a death, the preliminary information is listed in this forum and

- MISSION
- COMPLETE--Cpl. Andres Aguilar Jr., 21. of Victoria, Texas-- 11 & 13 Apr 06
- MISSION
- COMPLETE--Sgt. Israel Devora Garcia, 23, of Clint, Texas-- 12 Apr 06
- ITINERARY
- UPDATE--Staff Sgt. Darrell P. Clay, 34, of Fayetteville, N.C.-- 17 Apr 06
- MISSION
- COMPLETE--Staff Sgt. Eric A. McIntosh, 29, of Trafford, Pa./FT Myer, VA -- 11 April 06
- MISSION
- COMPLETE--Chief Warrant Officer 3 Michael L. Hartwick, of Orrick, Mo.-- 14 Apr 06
- MISSION
- COMPLETE--Cpl. Brian St. Germain, 22, West Warwick, RI-- 12 Apr 06
- MISSION
- COMPLETE--CPL Scott Procopio, 20, Saugus, MA-- 11 Apr 06
- MISSION
- COMPLETE--Hospitalman Geovani Padilla Aleman, 20, of South Gate, Calif-- 14 Apr 06
- MISSION
- COMPLETE--Pfc. Jeremy W. Ehle, 19, of Richmond, Va/Alexandria VA-- 12 April

PGR 000115

- [harleygeek : Forums](#)
- [hd_honey2003 : Home](#)
- [hldrider : Forums](#)
- [Helms : PCR in the Media](#)
- [HMMurray : Forums](#)
- [hrspwr : Home](#)
- [idrizie : Forums](#)
- [ibarleydavid : Home](#)
- [indianspirit : Forums](#)
- [indyharley : Forums](#)
- [imgal : Forums](#)
- [iScoot2 : Forums](#)
- [JR : Forums](#)
- [jb_shadow : Forums](#)
- [jcurran516 : Forums](#)
- [JD Hog : Forums](#)
- [jeffmcpsa : State Captains/Contact](#)
- [Jer72 : Home](#)
- [JFoosh : Home](#)
- [Jimi : Home](#)
- [jimmy : Home](#)
- [jimmy7694 : Forums](#)
- [jk844 : Forums](#)
- [John Desch : Forums](#)
- [Ken or Wildman : Home](#)
- [KennyB : Forums](#)
- [kgalloway : Forums](#)
- [Kid : Forums](#)
- [KL Miller : announcements](#)
- [kmerrell : Home](#)
- [Koolness : Forums](#)
- [Latin50 : Our History](#)
- [Lily : Forums](#)
- [magelor : Forums](#)
- [maginnis : Forums](#)
- [Marine82 : Forums](#)
- [merlin : Forums](#)
- [Michael : Forums](#)

the State Captain begins work to establish a Mission Ride for that soldier. As members gather more information, it will be posted in this forum.

In the main subject line, you will see the soldier's name, rank, age, and hometown and state. This makes it easier for members to be able to see at a glance if a ride is in their area. Don't just look at your state; there may be a mission in a neighboring state that is nearby. If you click on the post, you will be able to read all the information and add your comments. At the top of the thread you will find a little box you can check that says:

☐ Email me when someone replies to this thread

If you check that box, you will automatically receive an email each time an additional post is added to the thread. This is the best and fastest way to keep updated on the progress of a particular mission.

Please do not contact your State Captain asking them to email you with updates. As a PGR member, it is your responsibility to keep abreast of mission rides in your area. Your SC simply does not have the time to do this.

Once the SC has made contact with the family or their designated spokesperson and received their permission, the mission ride has been confirmed and the entire thread is moved to the PGR Confirmed Mission Rides. This is where detailed plans for the mission Rides are posted. Here you can track the progress and find ride staging areas and times, who's planning on making the mission, etc. Again, you can check the box to automatically receive updates.

If you'd like to support the PGR and our missions further, click on the **Paid Ads** frequently and purchase items you want from the **PGR Store**.

Thanks for your support!

06
MISSION
COMPLETE--Pfc. Joseph J.
Duenas, 23, of Ceres,
CA/Oakland, CA-- 13 Apr
06
LCPL NICHOLAS J.
SOVIE, Ogdensburg,
NY--25 May 06
MISSION
COMPLETE--Tech. Sgt.
Walter M. Moss Jr., 37, of
Houston, Texas-- 11 Apr 06
MISSION
COMPLETE--CPL Antoine
J. McKinzie, 25, of
Indianapolis, Ind.-- 11 Apr
06
Vietnam MIA Col. Eugene
D. Hamilton of Opelika, AL
- Arlington National
Cemetery- 26 Jun 06
ITINERARY
UPDATE--Tech. Sgt.
Patrick L. Shannon -
Oklahoma City - Vietnam--
15 Apr 06
Watch List
PLEASE READ BEFORE
POSTING
Lance Cpl. Marcus S.
Glimpse, 22, of Huntington
Beach, Calif.
Pfc. Roland E.
Calderonascenio, 21, of
Miami, Fla.

PGR 000116

- [midgett919 : Forums](#)
- [MOODY : Forums](#)
- [moonchild : Forums](#)
- [Murph H-D : Forums](#)
- [Norton : Forums](#)
- [numbawon : Home](#)
- [Omar53 : Forums](#)
- [padjr : Forums](#)
- [PARACHUTE : Forums](#)
- [peepaw : Home](#)
- [PGR Mad Dog : Forums](#)
- [PGR-Blade : Home](#)
- [phantom6000 : Home](#)
- [philliplovin : Forums](#)
- [pickle73 : Home](#)
- [pitcrew1 : Forums](#)
- [Pittman : Home](#)
- [Plainsman : State Captains/Contact](#)
- [pmbell64 : Forums](#)
- [Prettyhuge : Forums](#)
- [Proud USMC mom : Home](#)
- [Proud1sgt : Forums](#)
- [Purplegirl : Forums](#)
- [raiderbeast : Home](#)
- [rangerman : PGR in the Media](#)
- [Rdbling Lady : Forums](#)
- [Reaps : Members List](#)
- [reedro : Forums](#)
- [rickcrabb : Forums](#)
- [Ripp : Home](#)
- [rmounce : private messages](#)
- [Roacking Warrior : Forums](#)
- [ROJ : Home](#)
- [ron8453 : Forums](#)
- [RONLX1@VERIZON.NET : Home](#)
- [rsbeckwell : Forums](#)

- [Spc. Scott M. Bandhold. 37, of North Merrick, N.Y.](#)
- [Pfc. James F. Costello III, 27, of St. Louis, Mo.](#)
- [Cpl. Joseph A. Blanco, 25, of Bloomington, Calif.](#)
- [Pfc. George R. Roehl Jr., 21, of Manchester, N.H.](#)
- [Lance Cpl. Eric A. Palmisano, 27, of Florence, Wis.](#)
- [Spc. Kenneth D. Hess, 26, of Asheville, N.C.](#)
- [Spc. Shawn R. Creighton, 21, of Windsor, N.C.](#)
- [Spc. David S. Collins, 24, of Jasper Ga.](#)
- [Spc. James W. Gardner, 22, of Glasgow, Ky.](#)
- [Pfc. Joseph I. Love, 22, of North Pole, Alaska](#)
- [Spc. Daniel L. Sesker, 22, of Ogden, Iowa](#)
- [Family Only Service - Capt. Timothy J. Moshier, 25, of Albany, N.Y.](#)
- [Firefighter Captain Joe F. Prock, 52, Greenwood, LA](#)
- [FAMILY ONLY--Sgt. 1st Class John T. Stone, 52, of Norwich, Vt.](#)

PGR 000117

- [\[- Russ : Forums](#)
- [\[- sargie : Forums](#)
- [\[- seanpost : Most Recent Posts](#)
- [\[- sgtpoisie : Home](#)
- [\[- snuffy5353 : Forums](#)
- [\[- SteveTurner123 : Forums](#)
- [\[- stix : Forums](#)
- [\[- streetcruiser : Home](#)
- [\[- stretchnit : Forums](#)
- [\[- swade : Home](#)
- [\[- tazmatech : Home](#)
- [\[- Ted11276 : Home](#)
- [\[- tejas96 : Home](#)
- [\[- terry46901 : Forums](#)
- [\[- teubanks : Home](#)
- [\[- tomkat4 : Forums](#)
- [\[- Transylvanian Lady : Forums](#)
- [\[- TucsonVTXF3 : Home](#)
- [\[- Varaceman : Forums](#)
- [\[- w4egv : Home](#)
- [\[- Waterdog1952 : Most Recent Posts](#)
- [\[- weRideHDs : Home](#)
- [\[- Wescoot2 : Forums](#)
- [\[- willprevale : Forums](#)
- [\[- Winger_Ace : Forums](#)
- [\[- woodchuck : Forums](#)
- [\[- woody0402 : Forums](#)
- [\[- youngblood1 : Forums](#)
- [\[- zydeconut : Forums](#)

Copyright © 2005 -2006 by Patriot Guard Riders [Terms Of Use](#) [Privacy Statement](#)

PGR 000118

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.


PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448


Applicant's Exhibit No. 30



Tuesday, November 25, 2008

Patriot Guard Riders

Standing For Those Who Stood For us



Standing For Those Who Stood For us

[jomalley](#) [Logout](#)

Navigation

[Home](#)
[About Us](#)
[Leadership Contacts](#)
[Letters of Appreciation](#)
[Fallen Warrior Scholarship](#)
[ALL Forums](#)
[Help on the HomeFront](#)
[Most Recent Posts](#)
[Photo Gallery](#)
[Media/Press](#)
[Fallen Members](#)
[Events](#)
[Troop Support Partners](#)
[PGR FAQ](#)
[PGR Gear](#)
[Dialup Homepage](#)
[Hugh's Posts](#)

Directory

Click to send an email to the

Patriot Guard Riders Forum

Unanswered Not Read My Forums Active Topics


Forums > State Captain Area > State Captain/Ride Captain Archives

Subject: Presentation to Grieving Families.

You are not authorized to post a reply.

Author

Waldo •
Posts: 1325
Windsor, Co
YOU CAN TALK ABOUT US.
ALERT US.


BUT YOU CAN'T TALK ABOUT US.
SEND EMAIL
Message

Messages

Oldest First

Alert

16 Dec 2005 3:08 PM

Guys,
After attending the funeral of Dominic Sacco in Topeka, I was truly moved by a pre-service presentation made to the family on behalf of the PGR and Alr riders from Mulvane. The presented the family with a signed by all riders in the staging area "we support our troops" flag, a Challenge Coin from the Mulvane ALR, and a large defenders of freedom patch for the back of a jacket. After seeing this I felt it would be something good to do on a national level. After kicking it around with Jeff I was thinking that we might be able to do something like this as well. My thoughts were that we would overnight to the ride captain/state captain for each mission the following:

1. A memorial plaque

PGR 006781

<http://www.patriotguard.org/ALLForums/tabid/61/forumid/196/postid/4217/view/topic/Default.aspx>

11/25/2008

departments below:

User Support

Moderators

Photos

Media

Media Sightings

Submit Picture of Day

Web Site Administrator

Communications

Officer

Letters Of Appreciation

Help On The Homefront

Mission Request

Click on the link below to make initial contact with us regarding honor mission requests.

Contact Us

Contact Arlington National Cemetery

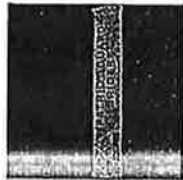
Messages

0 Unread Messages



2. 3X5 "We support our troops" Flag to be signed by all riders in attendance.

 0 Read Messages



PGR Doo-Rag



Large Fallen Heroes patch



This would be presented by the ride/state captain either before the service or at some other appropriate time.

What would you all think of something like this?

We could use the revenue from the banner ads and store sales to help defray any costs. (BTW go click on the ads if you would like to help out)

Jason Wallin "WALDO"
Deputy Executive Director
Corporate Treasurer
Patriot Guard Riders
970-402-1892

PGR 006783

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 31

Click to send an email to the departments below:

- User Support
- Moderators
- Photos
- Media
- Media Sightings
- Submit Picture of Day
- Web Site Administrator
- Communications
- Officer
- Letters Of Appreciation
- Help On The Homefront

Mission Request

Click on the link below to make total contact with us regarding honor mission requests:

Contact Us
Contact Arlington
National Cemetery

Messages

riegersteve
Posts: 234

Send Email
Message

08 Jan 2006 5:40 PM

Yesterday we had our first funeral in southern ca. and we did some things that i think should be done at all funerals at the cpt's discretion.

I bought a little journal book and had everybody sign it with a simple message, all the riders and some other non riders wrote their own messages, to the child of our brother that passed away. when the family (the wife) got the book she cried, because it showed her that we cared. In addition I want to point out the following. in 10-15 years the young child will not remember us or his dad, he is only 3 years old now, but he will forever cherish that book with all our little messages. the journal cost perhaps \$5 but will be around forever.

Also we took up a collection for the child, and raised over \$500. while i can not tell you to do it, it was a moving gesture on all those who participated, they gave something of themselves, to a stranger, and the only connection is that his father was in our military.

Also going forward (as soon as i can) the road guards, will be required to have the PGR flag, and the road captain will be required to fly the US flag as well as a smaller PGR flag. this is to identify us to those around.

I will be ordering about 10 pgr flags as soon as they become available and will send them out as needed to the appropriate people.

09 Jan 2006 3:03 PM

Twister
Posts: 1811
Broken Arrow, OK



Send Email
Message

Alert

Steve,
I like what you did very much. However, as a SC, you should be aware that National pays for a memorial plaque that we present to the family. I think it's an excellent memorial to present. I like the memorial book idea...if you'll give me an idea of where you got it, I'll see about setting something up so all SC can order it and National pay for it (depending on cost).

Thanks,
Jeff

In the end, we remember not the words of our enemies, but the silence of our friends.
Martin Luther King, Jr.

09 Jan 2006 4:03 PM

riegersteve
Posts: 234

Send Email
Message

Alert

PGR 006861

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 32



Patriot Guard Riders



jomalley Logout

...:: ALL Forums ::...

Navigation

- Home
- About Us
- Leadership Contacts
- Letters of Appreciation
- Fallen Warrior Scholarship
- ALL Forums
- Help on the HomeFront
- Most Recent Posts
- Photo Gallery
- Media/Press
- Fallen Members
- Events
- Troop Support Partners
- PGR FAQ
- PGR Gear
- Dialup Homepage
- Hugh's Posts

Directory

Patriot Guard Riders Forum

Unanswered Not Read My Forums Active Topics

Forums > State Captain Area > State Captain/Ride Captain Archives

Subject: State Captain Dues

You are not authorized to post a reply.

Author

Messages

Oldest First

Page 1 of 2 1 2 > >>

[Forums](#) [My Profile](#) [Search](#) [Search Members](#)

Click to send an email to the departments below:

User Support Moderators

Photos

Media

Media Sightings

Submit Picture of Day

Web Site Administrator

Communications Officer

Letters Of Appreciation

Help On The Homefront



Mission Request

Click on the link below to make initial contact with us regarding honor mission requests.

Contact Us

Contact Arlington National Cemetery



Messages

Dinky Dau • Posts: 1273

Anniston, Alabama
Past Dixie Regional Captain



19 Jan 2006 9:36 AM



01/18/2006 11:35 PM

Quote Reply Alert

What do you think about State Captains giving 20.00 per year as dues to be donated to a fund. Then once a year we will have a party for State Captains so that we can all get together and pass along ideas or lessons learned from other State Captains. Just an idea???

Jim (Dinky Dau) Lorenzo
USA (Ret.)
(256) 239-5058 (call anytime if you need help)

AL State President, VoVMC

Proud Member of the PGR Flag Line

Past Alabama PGR State Captain
Past PGR Dixie Regional Captain

Only two defining forces have ever offered to die for you:
Jesus Christ and the American G.I.
One died for your soul, the other for your freedom.
Thank them both!!

20 Jan 2006 10:17 AM



no dues - buy from the PGR store

Richard 'IndyHarley' Wilbur
Veteran ('65-'69)
SC IN PGR ('05)
Retired LEO and Blue Knight MC Member

For quick Mission information in IN see - <http://indianapatriotguard.org/missions.htm>

20 Jan 2006 10:23 AM



IndyHarley • Posts: 3861

Indiana



Dinky Dau • Posts: 1273

Anniston, Alabama
Past Dixie Regional

PGR 006865

11/25/2008 11:09 AM

0 Unread Messages
0 Read Messages



PGR Doc-Rag



Large Fallen Heroes patch

IndyHarley
Posts: 3861
Indiana



Send Email
Message

Dinky Dau
Posts: 1273
Anniston, Alabama
Past Dixie Regional
Captain

I've made several purchases from the Store but that is not going to fund a gathering for Captains to exchange ideas and pass on experiences. The store funds PGR and all of it's expenses plus the new plaques that there putting out.

Jim (Dinky Dau) Lorenzo
USA (Ret.)
(256) 239-5058 (call anytime if you need help)

AL State President, VoVMC

Proud Member of the PGR Flag Line

Past Alabama PGR State Captain
Past PGR Dixie Regional Captain

Only two defining forces have ever offered to die for you:
Jesus Christ and the American G.I.
One died for your soul, the other for your freedom.
Thank them both!!

20 Jan 2006 10:45 AM

then go to the National Gathering - no dues



Richard 'IndyHarley' Wilbur
Veteran ('65-'69)
SC IN PGR ('05)
Retired LEO and Blue Knight MC Member

For quick Mission information in IN see - <http://indianapatriotguard.org/missions.htm>

20 Jan 2006 10:51 AM

Bottom line is you just don't want to go, should have said that from the beginning. We are going to the National but like every other organization out there that has their ducks all in a row, they have monthly (or at least quarterly) meetings to disseminate information, lessons learned and to enjoy each others company. Disregard this thread in the future, I'd like individuals that want to get together and learn and enjoy the camaraderie!



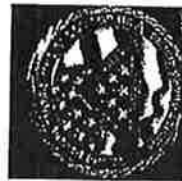
PGR 006866



Small Fallen Heroes patch



PGR Amiband



Wounded Warrior Challenge Coin



Jim (Dinky Dau) Lorenzo

USA (Ret.)

(256) 239-5058 (call anytime if you need help)

AL State President, VoVMC

Proud Member of the PGR Flag Line

Past Alabama PGR State Captain

Past PGR Dixie Regional Captain)

Only two defining forces have ever offered to die for you:
Jesus Christ and the American G.I.
One died for your soul, the other for your freedom.
Thank them both!!

20 Jan 2006 12:23 PM



We'll sir, I will disregard the thread but you certainly missed my point and certainly judged me without knowing me.
Have a good day sir.

Richard 'IndyHarley' Wilbur

Veteran ('65-'69)

SC IN PGR ('05)

Retired LEO and Blue Knight MC Member

For quick Mission information in IN see - <http://indianapatriotguard.org/missions.htm>

20 Jan 2006 12:28 PM



I think the point might have been that at the National get together, there can be a special time for Captains to get together and do just that. Chat about experiences. Maybe the night before it is set to start or an early morning breakfast on the second day. Then each of you just buy your own meal and shoot the breeze.

Respectfully, Vi

avonvicooper

Posts: 478

Richmond Hill, GA



PGR 006867

cgbrocksmith

Posts: 1291

Quincy, IL - "Defend
Those Who
Defended Us"



21 Jan 2006 6:04 AM



Dues do not make an organization more or less organized (just better funded). I think this needs to be left to the National Directors. If it is warranted and needed then so be it. If not, if it ain't broke, do fix it.

MIAP Central US Operations Coordinator

"To Care For Him Who Shall Have Borne The Battle" - Abraham Lincoln

President Abraham Lincoln stated in the Gettysburg Address:

"From these honored dead we take increased devotion to that cause for which they here gave the last full measure of devotion - that we here highly resolve that these dead shall not have died in vain."

Dying for Freedom isn't the worst that could happen...**BEING FORGOTTEN IS!**

Respect and truth, not law, counters the obnoxious!

PGR 006868

Rough Rider •

Posts: 1358

Ballwin, MO

MO Ride Captain



Send Email

Add Signature

21 Jan 2006 11:55 PM



How is it possible that up until now I have not voiced an opinion on this? Maybe it is the wisdom of my age or the lack thereof. IMHO dues aren't necessary for the reasons you put forth, Jim. It would take a lot more than \$1000 or \$1500 to fund a meeting.

I agree that there is good reason for all state captains and ride captains to get together and chat. Only good would come from it. But I don't think we need dues to fund it. How about some multi-state conferences. Get 3 to 5 of the states in a region of the country together where your experiences are more likely to be similar. Then once a year if this annual thing continues, we could meet as one group, that is everyone who is there. I still don't see the need for dues. Now, somewhere down the line, maybe a membership fee would be good, but still not for the reasons given and then it would be for all members.

LIRB

Rough Rider, USNR-Ret

Vietnam '67-68

MO Ride Captain

ICV/MC

Ebay •

Posts: 0

Send Email

Add Signature

23 Jan 2006 8:30 AM



I would put in my 2 cents but it would be censored anyway. No suggestions, opinions, no dues. Censor me!

Twister •

Posts: 1811

Broken Arrow, OK



Send Email

Add Signature

28 Jan 2006 9:08 PM



I think all of you ought to just give me \$20 a month each and once a year, I'll throw myself a huge party and call each of you the next day and tell you all about it ☺

In the end, we remember not the words of our enemies, but the silence of our friends.
Martin Luther King, Jr.

PGR 006869

willprevale ●
Posts: 0

 [Send Email](#)
 [Messages](#)

28 Jan 2006 9:10 PM



ummm... why dont I think that will work??

Rough Rider ●
Posts: 1358
Ballwin, MO
MO Ride Captain

 [Send Email](#)
 [Messages](#)

29 Jan 2006 8:10 PM



Hey Twister,

That would mean that you would be making big bucks and then you would have to hire me to account for something. To make sure that I have the time to do that accounting a 10% retainer is appropriate. You can start sending me \$2 per month for each RC and SC as soon as you can.

LLRB
Rough Rider, USNR-Ret
Vietnam '67-'68
MO Ride Captain
ICVNC

attitude ●
Posts: 53

 [Send Email](#)
 [Messages](#)

30 Jan 2006 6:21 AM



no dues, no meetings, we all have enough to do.
to much paper work.
just covering our mission statement is enough on my agenda.
annual get together for brotherhood is great.
to discuss things?????????
we do enough chit chatin' on emails now.

i think one reason this organization is growing so fast is no dues, no rules.
do what you can when you can.
most people are very busy with their everyday life.
i think.

what ever the reason we all must remember our mission!!
everything else is unimportant.

think i've typed enough for now.
just my opinion.

PGR 006870

Mike
IL SC

ps i believe we are the best organization in the USA

cgbrocksmith •

Posts: 1291

Quincy, IL - "Defend
Those Who
Defended Us"



30 Jan 2006 7:30 PM



I know I stated that whatever National deemed necessary would be appropriate, but after Jeff's last post...let's leave it up to Waldo.

MIAP Central US Operations Coordinator

"To Care For Him Who Shall Have Borne The Battle" - Abraham Lincoln

President Abraham Lincoln stated in the Gettysburg Address:

"From these honored dead we take increased devotion to
that cause for which they here gave the last full measure of devotion - that we
here highly resolve that these dead shall not have died in vain."

Dying for Freedom isn't the worst that could
happen...BEING FORGOTTEN IS!

Respect and truth, not law, counters the obnoxious!

PGR 006871

Wescot2 ●
Posts: 2885
Park Ridge, Illinois



Send Email

Message

30 Jan 2006 7:57 PM

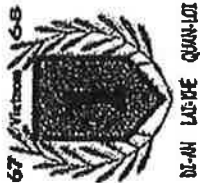


Gee Jeff.....I sent you my check via mail, guess what.....it was stamped Return to Sender.....address unknown.....no such person.....no such zone.....

X-Y-Z (you figure it out - Get out your Captain Video Decoder Ring)

Home 847-698-7383
Cell 847-217-1862

If your gonna be One.....Be a BIG RED ONE



Truth - You Can't Handle the TRUTH

sgtpotsie ●
Posts: 3667
New Mexico SC
Albuquerque, NM

30 Jan 2006 8:52 PM



Obviously it has it's ups and downs. If National says they do not need outside donations to fund operations, I am not gonna kick a dead horse and insist they take my money. Personally, I don't like the potential of the National leadership having to dig into their pockets to pay for plaques, server expenses, etc. As of now they get the money from PGR store sales and ad clicks, but what happens during slow times? It is my hope that they would ask the help of at least the state captains if they needed it.



But for now, it seems to be working well. Should the need arise to kick a few bucks their way, I'll be more than willing.

Michael "Potsie" Postel
SSgt, USAF
I.Y.A.A.Y.A.S.I

Riding in memory and honor of Jim "Norton" Rolfe. You will always be our SC brother.

"I feel how weak and fruitless must be any word of mine which should attempt to beguile you from the grief of a loss so overwhelming. But I cannot refrain from tendering you the consolation that may be found in the thanks of the Republic they died to save.
I pray that our Heavenly Father may assuage the anguish of your bereavement, and leave you only the cherished memory of the loved and lost, and the solemn pride that must be yours to have laid so costly a sacrifice upon the altar of freedom."
-Abraham Lincoln

Waldo •
Posts: 1325
Windsor, Co
YOU CAN TALK ABOUT US...



BUT YOU CAN'T TALK WITHOUT US.
Send Email
Missed

31 Jan 2006 2:31 AM



Posted By sgtotsie on 01/30/2006 7:52 PM

Obviously it has it's ups and downs. If National says they do not need outside donations to fund operations, I am not gonna kick a dead horse and insist they take my money. Personally, I don't like the potential of the National leadership having to dig into their pockets to pay for plaques, server expenses, etc. As of now they get the money from PGR store sales and ad clicks, but what happens during slow times? It is my hope that they would ask the help of at least the state captains if they needed it.

But for now, it seems to be working well. Should the need arise to kick a few bucks their way, I'll be more than willing.

hey I know you all want to help....

here is a way you can. If you see the firefox browser ad underneath the regular ads on the forum you can install that browser. they are currently paying \$1. per for each new windows install. this is unheard of in banner advertising and if half of the membership downloaded and used the browser just once. I would be free and clear on the server that I just put in last weekend.

thanks
J

PGR 006873



Jason Wallin "WALDO"
Deputy Executive Director
Corporate Treasurer
Patriot Guard Riders
970-402-1892

**American By Birth
Biker By Choice
Patriot Forever!**

Tact and Political Correctness were developed by those who lack the testicular fortitude to say what they really mean!

Shamdog ●
Posts: 481
Beachwood, NJ



[Send Email](#)
[Message](#)

31 Jan 2006 7:20 AM



I'll do it tonight.

"Some say a hero is born to be brave. I say a hero is just a scared man who don't walk away".

- Kenl Thomas, US Army Ranger
Somalia, 1993

verbalcvma ●
Posts: 28

[Send Email](#)
[Message](#)

09 Feb 2006 8:54 PM



I think that sometime during Nationals we could have a RC and SC meeting for all that are present. Regional meetings on a quarterly basis may work. Having monthly meetings or even quarterly meetings for all RC and SC would be a lot of travel. I like to travel but the cost does add up after a little while.

Freedom Has A Price The Protected Will Never Know

PGR 006874

sgtpotsie
Posts: 3667
New Mexico SC
Albuquerque, NM


11 Feb 2006 5:36 AM



My thoughts on the summer shindig: I agree we should all get together and meet, but aside from that, I thought the whole point of it was to get together when we weren't dealing with the loss of another hero. I could be wrong though. There will be plenty of time to talk, just not sure we want to pin ourselves down with all that will be going on there.

Michael "Potsie" Postel
SSgt, USAF
I.Y.A.A.Y.A.S!

Riding in memory and honor of Jim "Norton" Rolfe. You will always be our SC brother.

"I feel how weak and fruitless must be any word of mine which should attempt to beguile you from the grief of a loss so overwhelming. But I cannot refrain from tendering you the consolation that may be found in the thanks of the Republic they died to save.

I pray that our Heavenly Father may assuage the anguish of your bereavement, and leave you only the cherished memory of the loved and lost, and the solemn pride that must be yours to have laid so costly a sacrifice upon the altar of freedom."

-Abraham Lincoln

Mac
Posts: 262
Manchester Wis.


24 Feb 2006 8:59 PM



Someone should pay me twenty bucks for all the time I spend answering emails and phone calls every day. Been nuts since we hit all the states papers here.

Former State Capt.

hdx2
Posts: 349
Central District
Captain Springfield,
Oregon

17 Mar 2006 1:55 PM



Dinky Dau, I appreciate that you want to make suggestions that would help our cause and make PGR financially fit. Please keep your suggestions coming but understand that there are many members with many viewpoints. This is the place to discuss them. I appreciate your strong support for our military, veterans and the PGR.

PGR 006875



GHOSTDANCER •

Posts: 389
Fairmont, WV
WV Ride Captain,
RWB Book
Coordinator



USN 1970 - '74

Rick_Klein@patriotguard.org

Proud father of Cpl R.J. Klein, USMC

(Current Status = 2nd Recon Battalion, Camp Lejeune, NC - Swift - Silent - Deadly -

18 Mar 2006 8:17 AM



Getting this or any part of this group together for a business meeting is going to be next to impossible. This is a big country and many of us have limitations on how far we can travel. It has been suggested in other threads that we have a chat room set up and if we use that idea and set one up for just SC's, RC's and National leaders that would be a good way to schedule monthly or quarterly business meetings without having to find a place convenient to all.

We have one set up in TinCanSailors that runs every night from 2100 to midnite Eastern and it has proved a valuable tool to keep track of the thinning numbers of WWII era Vets and their health and family issues. This concept could be carried over to this group and even password protected for privacy if need be. This way we could hash out a lot of issues without emailing back and forth or driving half way across the country for an hour long meeting. We could have it set so special meetings could be called anytime but a regular schedule could handle many problems. I would suggest one person be appointed by National to moderate the room unless it's a special meet called by any one Captain, at which time the floor would be his to do the moderating.

Give it some thought!

John E. Schwartz
WV Ride Captain
WV RWB Book Coordinator
Fairmont, WV
Member#4923
"with honor and respect to all."

JoeRocketIII •

Posts: 234
Bossier City,
Louisiana

18 Mar 2006 9:50 AM



I'm just a RC so my intent was to read this and move on but, seeing some of the other post to this thread has compelled me to add my meager opinion as unpopular as it may be...Hmmm State Captain Dues, I think their paid in full...I think like me, most of you do this for the cause and not for the patch or



recognition, you all have a life outside of PGR and the time you spend supporting, organizing, answering our questions on here and keeping up on PGR happenings, responding to e-mails and phone calls are your dues and then some.... You fill that tank regularly for more than a pleasure cruise because you see freedom isn't free and your selfless contributions keep this machine doing the right thing.

I like the local meet and greets and would prefer my SC deal with national issues without paying any more dues, think I may have taken this thread too literally but as big as we are getting I can see a need for change in the future that may actually require a meeting of the minds at national level. Maybe when that time is clear some organizational sponsorship would help....Maybe Bill Gates, Nike, Reebok, Harley Davidson, but you won't get much done on a \$20 bill from each SC.

I am sure that much is spent by the SC's weekly at minimum in internet cost and time...RJ3

They May See the good you do as self-serving. Continue to do good!

They May See your generosity as grandstanding. Continue to be generous!

They May See your warm and caring nature as a weakness. Continue to be warm and caring!

For you see in the end it is between you and God and it never was between you and them anyway!!!!!!

V/R

Joe Jones

One of Genes Six Shooters

Page 1 of 2 1 2 >

You are not authorized to post a reply.

Forums > State Captain Area > State Captain/Ride Captain Archives > State Captain Dues

ActiveForums 3.6

PGR 006877



Copyright © 2005-2008 by Patriot Guard Riders Terms Of Use Privacy Statement

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 33

Perry, Bonnie

From: Jeff Brown [jeffbrown@valmet.com]
Sent: Friday, February 24, 2006 4:38 PM
To: David240@aol.com; chlpe@pobox.com
Cc: Bonnie Cutler; Kurt Mayer; Kevin Smith; Hugh Knaus; Jason Wallin "Waldo"
Subject: RE: Patriot Guard

Chip,

I really hate to do this, but the Patriot Guard Riders cannot allow individual state PGR sites for various legal and administrative reasons. Legally, it opens the door for unauthorized use of the name and logo and sets a precedent that, should it ever be contested, weakens our position against the unauthorized use. Administratively, we have found that information that should be on the national site gets posted to a state site and people begin missing information. I hope you understand.

Thanks,
Jeff Brown "Twister"
Executive Director
Patriot Guard Riders
www.patriotguard.org

-----Original Message-----

From: Chip [mailto:chlpe@pobox.com]
Sent: Friday, February 24, 2006 11:27 AM
To: David240@aol.com
Cc: jbrown@patriotguard.org
Subject: Patriot Guard

David,

My name is Chip Elliott and I am the Connecticut State Captain. We have a Connecticut web site which can be found at <http://www.patriotguardct.org>

If you give me permission and send me the information, I will post your name, nickname, city, state and email address (which will be blocked from bots).

Our National Site is the best place to get current information, stay in touch with the National happenings, etc. Our local site will hold all local information such as missions, mission status, etc.

Thank you for your interest, and forward me that information if you wish to become an active member of the CT chapter of PGR.

Chip
Micah 6:8

PGR 002232

6/10/2008

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 34

From: Jeff Brown <jeffbrown@valornet.com>
Sent: Thursday, May 11, 2006 7:43 AM
To: dsj30c@yahoo.com
Cc: Execs <exec@patriotguard.org>
Subject: Your website

Dear Sir or Madam,

Please remove the Patriot Guard Riders Logos from your website. Although we appreciate your position on the war, we feel your site is purely political in nature and the use of PGR logos intimates our support of these views.

Sincerely,

Jeff Brown "Twister"

Executive Director

Patriot Guard Riders

www.patriotguard.org

No virus found in this outgoing message.

Checked by AVG.

Version: 7.5.524 / Virus Database: 270.3.0/1503 - Release Date: 6/14/2006 6:02 PM

BROWN007994

IN THE UNITED STATES
PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

JEFF BROWN,

Opposer,

vs.

Opposition
No. 91181448

PATRIOT GUARD RIDERS, INC.,

Applicant.

REVISED
ORIGINAL

The deposition of BONNIE RUTH PERRY,
taken in the above-entitled cause, before
SUZANNE THALJI, Certified Shorthand Reporter of
the State of Illinois, on August 2, 2011, at
150 North Michigan Avenue, Suite 2700, Chicago,
Illinois, pursuant to notice, commencing at
12:55 p.m.

REPORTED BY: SUZANNE THALJI, CSR, RMR, CRR
LICENSE NO.: 084-002337
JOB NO.: 168211

1 APPEARANCES:

2 McAFEE & TAFT, by
3 MS. JENNA PERRY
4 1717 South Boulder Avenue, Suite 900
5 Tulsa, Oklahoma 74119
6 (918) 587-0000
7 jenna.perry@mcafeetaft.com

8 Representing the Opposer;

9 CLARK HILL PLC, by
10 MR. JAMES A. O'MALLEY
11 MR. DAVID J. MARR
12 150 North Michigan Avenue, Suite 2700
13 Chicago, Illinois 60601
14 (312) 985-5562
15 (312) 985-5558
16 jomalley@clarkhill.com
17 dmarr@clarkhill.com

18 Representing the Applicant.

19 ALSO PRESENT:

20 MR. WILLIAM HAROLD RICHART II
21
22
23
24

1

I N D E X

2

WITNESS

3

BONNIE RUTH PERRY

4

EXAMINED BY

PAGE

5

MR. O'MALLEY

4

6

MS. PERRY

56

7

APPLICANT'S EXHIBITS

8

NUMBER

DESCRIPTION

PAGE

9

Exhibit 35

11/13/05 email from Brown to
Yunker, et al., PGR 002229

15

10

Exhibit 36

Emails dated 6/15/06,
PGR 002238

23

11

12

Exhibit 37

Emails dated 10/30/06 and
10/31/06, PGR 002999-3002

30

13

14

PREVIOUSLY MARKED

15

Exhibit 6

Jeff's Final Corner, 11/7/06
BROWN009964

38

16

Exhibit 7

Patriot Guard Riders Forum,
6/18/08, PGR 002174-2177

52

17

18

Exhibit 33

Emails dated 2/24/06,
PGR 002232

19

19

20

21

22

23

24

1 BONNIE RUTH PERRY,
2 having been first duly sworn, was examined and
3 testified as follows:

4 DIRECT EXAMINATION

5 BY MR. O'MALLEY:

6 Q. Bonnie, have you had your deposition
7 taken before?

8 A. Yes.

9 Q. So you kind of generally know how a
10 deposition works?

11 A. Yes.

12 Q. Okay. I am just going to give you some
13 reminders here. I am going to ask you a bunch
14 of questions relating to this trademark
15 opposition, and you will have to answer them
16 under oath. The other lawyer here, Jenna Perry,
17 will have an opportunity to ask you questions if
18 she so chooses.

19 The court reporter is taking everything
20 down, will prepare a written record of
21 everything that's said, which is referred to as
22 a transcript. If you want, you can review the
23 transcript to check that it's accurate and make
24 any corrections before signing it. Do you

1 understand that?

2 A. Yes.

3 Q. Yes. Thank you. It is very important
4 that you understand the questions and give
5 accurate answers. If there is anything that you
6 don't understand or anything that you don't know
7 or aren't sure of, just let us know, okay?

8 A. Yes.

9 Q. Please be sure to verbalize your
10 answers to make it easier for the court
11 reporter, so no nodding your head, no shrugging
12 your shoulders. Are you feeling good this
13 afternoon?

14 A. I feel great.

15 Q. Okay. Are you on any medications that
16 would impact your ability to get through this
17 deposition?

18 A. No.

19 Q. Okay. Let's get started here. Can you
20 please provide me with your full legal name?

21 A. My full legal name is Bonnie Ruth
22 Perry.

23 Q. Can you spell that?

24 A. P-e-r-r-y. Bonnie is B-o-n-n-i-e.

1 Q. Okay. Have you ever had any previous
2 names that you went by?

3 A. Yes, I have, and before this I was
4 Bonnie Ruth Cutler, C-u-t-l-e-r.

5 Q. Okay.

6 A. And do you want my others?

7 Q. Sure.

8 A. And then Bonnie Rodriguez,
9 R-o-d-r-i-g-u-e-z, Salcido, and Milam.

10 Q. Okay. And what is your address? Where
11 do you live?

12 A. I live in Pasadena, Texas. My address
13 is 4303 Winterborne Drive, Pasadena, Texas
14 77505.

15 Q. And where do you work? What kind of
16 work do you do?

17 A. I work for a law firm, Andrews Kurth,
18 downtown Houston, Chase Tower.

19 Q. Okay. What do you do there?

20 A. I am a legal assistant.

21 Q. Okay. What is your educational
22 background?

23 A. High school and some college.

24 Q. Okay. And were you in the military?

1 A. I was in the United States Navy.

2 Q. And when were you in the military?

3 A. I joined the Navy straight out of high
4 school, so I was there from 1983 to 1989.

5 Q. 1989, okay. And then do you have -- we
6 have talked here -- ride names or road names?

7 A. I do have a road name or ride name, and
8 basically it's a logon for a website. It's
9 BonRu, B-o-n-R-u, all one word.

10 Q. When did you first hear about the
11 Patriot Guard Riders?

12 A. Probably in February, March of 2005. I
13 joined a -- or five. I joined a group called
14 the XL Forum because I have a Harley-Davidson
15 Sportster, and I met Jason Wallin through that
16 site, and we became friends on the site for the
17 months that we were in it together. And then
18 around the end of 2005, Jason mentioned to me
19 that he and a friend of his were talking about
20 putting together an organization that would do
21 what later turned out to be the Patriot Guard
22 Riders and wanted to know if I wanted to
23 participate in helping to pull it together and
24 be a part of it and do all the things that went

1 with it.

2 Q. Okay. Do you know who that friend was?

3 A. Yes. It was Jeff Brown.

4 Q. Okay. Did you know that at the time,
5 or did that come a little later?

6 A. I probably -- within days, within a day
7 or so of him even mentioning it to us, then he
8 put us in touch with Jeff.

9 Q. Okay. So the timing of that, do you
10 know when -- I know you said it was later 2006.
11 Do you have any more specific knowledge as to
12 the timing of when you joined?

13 A. It was more November 2005, right around
14 that area.

15 Q. Okay. And so once you joined, how did
16 you join?

17 A. Well, initially we didn't have any set
18 ways of doing it. It was e-mail, and basically
19 that was it. I joined when Jason said, hey, do
20 you want to do this? Send Twister an e-mail.

21 Q. Twister is?

22 A. Twister is Jeff Brown. I apologize.

23 Q. Okay.

24 A. Send Jeff Brown an e-mail and let him

1 know that you're onboard. I've already told
2 him -- gave him a list of names of people I've
3 been contacting and recruiting to come do this.
4 So give him an e-mail and ask him what you want
5 him to do and take it from there, because that
6 was it. There was no website, no official
7 organization. It was just putting it together.

8 Q. At that time?

9 A. Yes.

10 Q. So what did you start doing for the PGR
11 or in connection with the PGR?

12 A. Right away Jeff asked me if I would
13 take over state captain duties for the Texas
14 state, and that was basically to watch the DOD
15 lists and to watch news for any kind of fallen
16 hero that we could go out -- initially we did
17 start out -- basically it was for KIAs, and we
18 evolved and we grew larger and had more people.
19 So my job was to follow the news and the DOD,
20 and anytime I knew of one that was in Texas, I
21 would recruit people because each of us -- after
22 we came on, each of us were actively out seeking
23 people to join us as well.

24 Q. Okay.

1 A. And so I would send out an e-mail to
2 everybody I know, look -- that rides bikes and
3 does that with us. Look, I have joined this
4 organization. We are going to start this little
5 thing where we go out and we -- told them the
6 whole gist of what we did and do you-all want to
7 join.

8 Q. After that did you ever take on more
9 responsibilities or have what type of work you
10 were doing for the organization change?

11 A. Yes.

12 Q. Can you kind of take me through your
13 involvement and what you did and when?

14 A. Okay. After that and after I started
15 building up our membership in Texas -- which
16 each state captain, you know, each volunteer
17 that came in, the first ones were usually made
18 the state captains. So as each of us came on,
19 my job -- it grew because then I started -- we
20 started having these deluxe e-mail systems that
21 we sent out to everybody, assigning ride
22 captains and getting -- building like a little
23 echelon of leadership in the state and after --
24 Texas was the biggest, and at the time we were

1 probably one of the most active, and we had had
2 quite a few missions at this point.

3 And they needed someone that could step
4 up and kind of be a liaison between the higher
5 level PGR, which was Jason and him because
6 they're getting all these e-mails from 500
7 people.

8 Q. I'm sorry. Can I interrupt? Jason and
9 him?

10 A. Jason Wallin and Jeff Brown.

11 Q. Okay. Thank you.

12 A. They were getting all these e-mails
13 from people, let me do this, let me do this. So
14 we developed a hierarchy so they could contact
15 kind of up the chain of command so that one
16 person wasn't getting everybody's e-mails.

17 So after I got Texas all organized in
18 that manner, then they needed someone to serve
19 as a liaison between them and all the state
20 captains who had their leadership, so they asked
21 me if I would do that in February of 2006.

22 Q. Okay. Then anything beyond that? How
23 long were you in that position?

24 A. As national captain, I was national

1 captain from February 2006 to November 2006.

2 Q. What changed in November of 2006?

3 A. In November 2006 there became some
4 issues within the hierarchy of the leadership
5 that brought a lot of discord in the
6 organization, and they needed to make some
7 changes to the current board of directors. So
8 they asked if I would step in and serve on the
9 board to help get things back in line.

10 Q. Okay. So you became a board member in
11 November of 2006?

12 A. Yes.

13 Q. Who else was on the board at that time?

14 A. At the time that I was brought on the
15 board, the -- previously it was Jeff Brown,
16 Jason Wallin, and Bill "Snap" Lines, Lines,
17 L-i-n-e-s. They were the original three-man
18 board, and then when they needed to make changes
19 and Jeff was off the board, taken off the board,
20 they brought on Ronny Awtry, myself and Ed
21 Mueller.

22 Q. Okay.

23 A. And at the time we just served -- we
24 just served -- Bill "Snap" Lines took the

1 executive director position, president. Jason
2 was treasurer, I believe, and then Ronny Awtry,
3 they brought him in. He went ahead and did
4 secretary, and then Ed and I were just board
5 members.

6 Q. Okay. So just kind of at large?

7 A. At large, just to help --

8 Q. I don't know if that's the proper term.

9 A. Yeah.

10 Q. And then after that when -- what are
11 you doing after that time? How long are you a
12 board member?

13 A. Well, after that we started looking --
14 basically, there was no real organization.
15 There was no documentation, paperwork, any --
16 you know, not any kind of full set of corporate
17 papers or anything. So we started trying to do
18 our best to pull some stuff together and make it
19 official, organized, so that, you know, you
20 could read the books and tell what was going on.

21 And during that time they made some
22 changes on job duties. Ronny ended up taking
23 over treasury. I took over the secretarial
24 position, and then I was also vice president.

1 And then they made Ed Mueller a vice president.

2 Q. Okay.

3 A. And then Jason I think at that time
4 just didn't hold any kind of -- he was just --
5 he was having some family issues, so he didn't
6 have any real responsibility at that moment.

7 Q. Okay. But he was still considered a
8 board member?

9 A. Yes. He was an active board member.

10 Q. Okay. And then how long were you in
11 these positions until?

12 A. I agreed to serve for one year. So I
13 stayed in that position till November 5th of the
14 following year, 2007.

15 Q. 2007, okay. And then after that are
16 you still active in the PGR?

17 A. I am. I am a member, but I've done
18 some mission stuff, not as much as I did before,
19 and I handle the plaques. We have a plaque
20 administration program where every time we do
21 have a mission, the state captain or his staff
22 will request a plaque, and the Patriot Guard
23 Riders pays for the plaque. The organization
24 does. And we have it presented to the family of

1 the fallen.

2 MR. O'MALLEY: Okay. I am going to go ahead
3 and introduce a document.

4 (Applicant's Exhibit 35 was
5 marked for identification.)

6 THE WITNESS: Can I look at it?

7 MR. O'MALLEY: Yes.

8 Q. Okay. This is Applicant's Exhibit
9 No. 35, produced by PGR, identified as
10 PGR 002229. Can you take a look at this
11 document and let me know if you're familiar with
12 it?

13 A. Yes.

14 Q. Okay. Can you tell me who sent this
15 e-mail?

16 A. This is the e-mail that Jeff Brown sent
17 out to a group of us that were basically the
18 initial people who came on and he gave state
19 captain duties to.

20 Q. Okay. And you received this e-mail?

21 A. Yes.

22 Q. You see your name in the "To" area?

23 A. Yes.

24 Q. Where? I'm sorry.

1 A. Down at the bottom, the next to the
2 last line, Bonnie Perry right in the middle.

3 Q. Okay. So in this e-mail Jeff Brown is
4 saying -- he said, "Hey Folks, First, a big
5 thank you for getting the word out! Well Done!

6 "The explosion of the Patriot Guard
7 Riders is phenomenal. I'm getting a dozen or
8 more emails each day from patriots wanting to
9 join us and our missions. Many of you have
10 worked very hard to spread the word to your
11 state and national organizations (American
12 Legion, VFW, ABATE, Combat Vets, etc.) and we
13 now have national recognition from many of them.

14 "I know many of you forward our emails
15 to your brothers and sisters in those
16 organizations. This is excellent, it gets the
17 word out to hundreds of patriotic riders very
18 effectively."

19 What in your opinion is Jeff talking
20 about here?

21 A. Well, like I said earlier, our job as
22 state captains was to help build the
23 organization, build it up, recruit people, bring
24 in more members, so that we could effectively

1 present ourselves at the funerals, you know, be
2 an impressive group of people that show up and
3 do what we do.

4 Q. What happened at the funerals or when
5 you would attend or when the members from the
6 PGR would attend? What was happening there?

7 A. We attend a funeral, and we stand with
8 our flags in flag lines and create like a
9 line -- back then we really didn't have flags.
10 So what we'd do is we would ride up on our
11 bikes, and, you know, there would be all these
12 motorcycles rolling in, a motorcade, which was
13 quite impressive and touching. And then we
14 would just come and park our bikes and stand
15 respectfully and show respect for the family and
16 for the fallen hero.

17 If the protestors were there, we had
18 different things that we had to do, you know,
19 different ways to handle them, but we usually
20 were placed between the protestors and where the
21 family would be coming out of the church so that
22 they couldn't create a disturbance to the family
23 during their time of grief.

24 So having numbers was important, having

1 us -- the more, the better.

2 Q. So who was the PGR doing this for?

3 A. The families, for the heroes. I
4 mean --

5 Q. Now, would you show up unannounced, or
6 how did it come to be that you got from Point A
7 to attending the funeral? What was the process?

8 A. Well, my -- as state captain job, I saw
9 that we had a fallen hero. I would contact the
10 military numbers or the -- if it mentioned a
11 funeral home or whatever, find out, get the CAO.
12 The CAO is the -- I can't remember what it
13 means. It's the person in the military who has
14 contact with the family who handles all the
15 funeral arrangements, and we would contact them
16 and tell them who we are, explain who we are.
17 We're a group. We're the Patriot Guard Riders,
18 and we just want to come out to the funeral and
19 attend and show respect for this fallen hero and
20 let the family know that this hero didn't die in
21 vain, that other people out here are aware that
22 they passed. Even though you-all don't know us,
23 we know you. We know it happened.

24 That was our job, and we did it. So we

1 did it for the families and just -- that was it.
2 That was the gist, for the organization to go
3 out and represent.

4 MR. O'MALLEY: I would like to introduce or
5 reintroduce, I guess, what is Applicant's
6 Exhibit No. 33 which we discussed earlier today,
7 and that should be in your packet there.

8 MS. PERRY: Thirty-three?

9 MR. O'MALLEY: Thirty-three. I apologize.
10 That's one from this morning. I asked you about
11 yesterday.

12 MS. PERRY: I've got it.

13 MR. O'MALLEY: Are you ready?

14 MS. PERRY: I've got it, yeah.

15 BY MR. O'MALLEY:

16 Q. Take a look at this document. Again, I
17 will introduce it. It is Applicant's Exhibit
18 No. 33, which was produced by PGR and is
19 identified as PGR 002232. In the middle of
20 this, this document appears to have two email
21 messages, and at the bottom part there is an
22 email from somebody named Chip, dated
23 February 24, 2006, which is sent to an email
24 address David240@aol.com, and then cc'ing

1 jbrown@patriotguard.org. Who is
2 jbrown@patriotguard.org, if you know?

3 A. That is Jeff Brown, Twister.

4 Q. Twister, okay. In this email it says,
5 "David, My name is Chip Elliott, and I am the
6 Connecticut State Captain. We have a
7 Connecticut web site which can be found at
8 <http://www.patriotguardct.org>.

9 "If you give me permission and send me
10 the information, I will post your name,
11 nickname, city, state and email address (which
12 will be blocked from bots).

13 "Our National Site is the best place to
14 get current information, stay in touch with the
15 National happenings, etc. Our local site will
16 hold all local information such as missions,
17 mission status, etc.

18 "Thank you for your interest, and
19 forward me that information if you wish to
20 become an active member of the CT chapter of
21 PGR," signed "Chip" and then "Micah 6:8."

22 And then there appears to be a response
23 to this person Chip by Jeff Brown. Can you tell
24 me about this response?

1 A. Okay. What this represents -- is this
2 what you want me to tell you? What this
3 represents is this Connecticut -- several states
4 had started developing their own websites and
5 calling them Patriot Guard Connecticut, Patriot
6 Guard Minnesota, whatever, and they would do it
7 basically the same. And the reason was because
8 our website wasn't -- it didn't have the
9 strength to carry the load that we were bringing
10 in and crashed often, and they would lose
11 mission information. People couldn't -- so they
12 started developing their own little side sites.

13 The response that you have from Jeff is
14 he is telling them that the national site should
15 be the only site for the Patriot Guard Riders,
16 that the name and the logo that they are using
17 on their sites to correlate, to connect them to
18 ours, it belongs to the organization and that we
19 can't allow them to use it for their own side
20 sites.

21 Q. Okay.

22 A. And so it looks like he is telling them
23 that if he lets them do that, that it opens up
24 the door for other unauthorized use, and he is

1 just basically telling them it belongs to
2 Patriot Guard Riders and they can't use it.

3 Q. Okay. And what does Jeff's signature
4 line, for lack of a better term, say there?

5 A. It's "Jeff Brown 'Twister,' Executive
6 Director, Patriot Guard Riders," and it has our
7 website www.patriotguard.org.

8 Q. Did you receive this email?

9 A. Yes, I did.

10 Q. Why did you receive this email? Why
11 would Jeff have copied you on this?

12 MS. PERRY: Objection, that calls for
13 speculation, someone else's state of mind.

14 BY MR. O'MALLEY:

15 Q. If you know, why did Jeff copy you on
16 this?

17 A. I am the national captain, and this is
18 Chip, the state captain, and this is an issue
19 that should have come through me. I'm also on
20 the head shed, and Jeff was letting us all know
21 how he responded to Chip. I know that we all
22 discussed it prior to him sending an email.

23 Q. Okay. You mentioned head shed. What
24 is head shed?

1 A. Head shed is when we first got started,
2 instead of putting all of our names in an email,
3 they made a group name of us. It was me, Kurt,
4 Kevin, Hugh Knaus, Jason Wallin. We were
5 basically the top echelon leadership of the
6 organization.

7 Q. Was Jeff also in head shed?

8 A. Yes, yes.

9 Q. Okay.

10 A. Each one of us had a function, a job
11 that we handled, and so we were all included.

12 (Applicant's Exhibit 36 was
13 marked for identification.)

14 BY MR. O'MALLEY:

15 Q. Okay. This is Applicant's Exhibit
16 No. 36, which was produced by PGR, identified as
17 PGR 002238. Do you recognize this document?

18 A. Yes, I do.

19 Q. Can you tell me what it is?

20 A. It initially is an email -- Minnesota
21 had developed a back patch for their jackets
22 that people could use to recognize the name as
23 Patriot Guard Riders. They didn't use -- it
24 looks like they didn't use the logo. They just

1 put Patriot Guard Riders Minnesota on it. And
2 they let me know about it and told me -- I
3 mentioned it in a call with head shed. As you
4 can see, my email is to head shed, which was the
5 previous people that I named off in the last
6 email, and I told them all about it.

7 And then I got Minnesota to send me a
8 picture of their patch. I put it in the email,
9 forwarded it to them all so that they could see
10 what they had put on their jacket, just so we're
11 all aware of what's going on and when and where.

12 Q. Okay. And then there is a response
13 then from Jeff Brown, right?

14 A. Yes.

15 Q. Can you talk about his response here?

16 A. Yes. Jeff Brown is telling me and the
17 head shed, I'm sorry, but they can't do this.
18 The PGR name is trademarked, and they can't use
19 the name even on their patch because it belongs
20 to the organization.

21 He says it does not fit in with the
22 cumulative image that the PGR is trying to
23 establish across the nation, which is what we
24 were all working so hard to do.

1 Q. Okay. You mention in here a couple
2 things I want to touch on. The first is you are
3 saying that he's saying they did not have
4 permission to do this. Was there ever a time
5 when permission was granted for people to use
6 the name or logo?

7 A. Yes. There were --

8 Q. Can you provide me with an example or
9 two?

10 A. Okay. After this came up in fact,
11 there was another issue about another back
12 patch. Some other states wanted to do a back
13 patch that was our full logo, emblem, and at
14 first again we were like, well, we can't be
15 letting people go crazy, just doing it.
16 Otherwise, it's going to get hog wild. So they
17 did it anyway. They made it.

18 Q. Who is "they"? I'm sorry.

19 A. These are some people down in the south
20 around Alabama. They didn't realize -- because
21 they are a PGR and PGR leadership, they didn't
22 feel like they were separate and apart from the
23 organization. They felt like they were the
24 organization because we are all PGR. So they

1 designed and developed this back patch and had
2 it made up and sent us all a copy of it, sent us
3 a back patch.

4 Q. Who is "us"?

5 A. It would be all of us in head shed,
6 leadership group, me, Jeff, Jason, all of us
7 that are in the leader -- I believe he sent it
8 to all of us. It was Dinky Dau in Alabama who
9 did that, who sent it out, and he didn't think
10 there was an issue with it because he's PGR and
11 he created a PGR patch, and he just wanted to
12 say, hey, I -- and he didn't do it for
13 manufacture. He did it more -- he made the
14 patch and said here, for the leadership to wear,
15 and he sent it to select leadership.

16 And then another instance was when a
17 gentleman wanted to paint his entire motorcycle
18 with PGR. He was given the okay to go right
19 ahead and paint PGR all over his bike.

20 Q. How did that person obtain permission?

21 A. He emailed me and said I would like to
22 get a custom paint job on my motorcycle, and I
23 want to put the PGR emblem on it, and I want to
24 put Patriot Guard Riders and Riding with

1 Respect, and he wanted to put everything that we
2 were on his bike, so that he would be a rolling
3 tribute to the Patriot Guard Riders.

4 Q. Okay. And so then --

5 A. And he --

6 Q. I'm sorry. Go ahead, if you weren't
7 done.

8 A. I presented it to the head shed and no
9 one on head shed -- which included all the
10 people on the list, Jeff, Jason, me, Kurt.
11 Nobody had any objections to him doing that.

12 Q. Okay. This back patch, going back to
13 the previous one, did the PGR -- prior to that
14 time, was there a back patch?

15 A. No.

16 Q. Why not?

17 A. When you are in the motorcycle world,
18 you have to get approval for a back patch from
19 the -- it's COC. It's basically a governing
20 body for all the motorcycle clubs, and you have
21 to present it, kind of like a trademark thing.
22 You have to present what you want to do. They
23 have to go through, make sure it doesn't look
24 like anybody else's patch. There's certain

1 criteria it has to have. It can't have rockers.
2 Generally the rockers represent motorcycle
3 organizations that do different things than we
4 do. It's just -- I don't understand it all, but
5 I know you have to get that approval.

6 And we didn't want to go through -- us,
7 the head shed, having discussions on phones, it
8 wasn't anything that we wanted to get into.

9 Q. Okay. So in view of that, what was to
10 your knowledge the reaction when Dinky Dau I
11 think you said and maybe others created this PGR
12 back patch? What was the reaction to this?

13 A. Initially it was, oh, why did you do
14 that, but then we took it and we did present it
15 and got approval to be able to wear it and to
16 use it.

17 Q. Okay. And --

18 A. And --

19 Q. I'm sorry, go ahead.

20 A. By "we" the head shed just discussed it
21 and talked about what should we do going
22 forward, and we said okay, let's go ahead and
23 see if we can get approval, if this is okay.
24 Everyone liked it. Everybody thought it was

1 great and thought it would be a good money
2 raising -- we talked about the money that it
3 could bring in for the Patriot Guard Riders, and
4 so we sat down and decided what to do, and
5 someone was going to go talk to the COC and get
6 approval for it, and then we started
7 manufacturing.

8 Q. Did any members of the board ever meet
9 this Dinky Dau and discuss this with him, the
10 issues that it raised or brought up?

11 A. Well, we didn't meet with him -- we
12 talked to him on the phone. We did talk to him
13 on the phone, and he said that he got all of his
14 local approvals, and he thought it would be
15 okay.

16 Q. Okay. With regard to this permission
17 that we have talked about, who gave the
18 permission to whoever, to Dinky Dau, to the
19 individual who put the logos and whatnot on his
20 motorcycle?

21 A. Well, ultimately because Jeff was the
22 president, he got to have basically the ultimate
23 say. We all talked about it. We all discussed
24 it, the pros and cons, and once Jeff was on

1 board, okay, it's good for the organization,
2 then we can do it. Then he was the final say.

3 Q. Then he would --

4 A. Yes.

5 Q. -- send out the permission --

6 A. Oh, yes.

7 Q. -- after a discussion with the board?

8 A. Yes, with the head shed.

9 Q. The head shed. I apologize.

10 A. Yes.

11 MR. O'MALLEY: Can we take a five-minute
12 break.

13 MS. PERRY: Absolutely.

14 (Recess taken.)

15 (Applicant's Exhibit 37 was
16 marked for identification.)

17 BY MR. O'MALLEY:

18 Q. Back on the record. I am going to
19 introduce Applicant's Exhibit No. 37 here.
20 Applicant's Exhibit No. 37 was produced by PGR.
21 It is identified as PGR 002999 through
22 PGR 003002. This is an email from Jeff Brown
23 dated October 31, 2006, to somebody named John
24 Danner and cc's head shed as well as somebody --

1 lavendernlace@hotmail.com.

2 At the time of this email, did you
3 receive emails directed to head shed?

4 A. Yes.

5 Q. Have you seen this email before?

6 A. Yes, I'm sure I have.

7 Q. I would like to scroll down to either
8 the fifth or sixth paragraph that starts off --
9 it says, "Yes, the PGR sells stuff."

10 A. Got you.

11 Q. Can you please read that paragraph?

12 A. Yes. Yes, the PGR sells stuff...You
13 say that like it's a bad thing. That's how we
14 help finance the organization without any dues.
15 It keeps the website running. It's purchased
16 over 5,000 3 X 5 by American flags and poles for
17 our members to hold in flag lines to honor our
18 fallen heroes. It paid for PGR representatives
19 of the HOTH program to go to Walter Reed Army
20 Medical Center to meet with the medical staff
21 and the national leadership of the American
22 Legion and to visit the wounded soldiers there.
23 It paid for the Healing Fields at Sturgis, South
24 Dakota, and most recently it sent a \$1000 check

1 to a wounded soldier and his family who were in
2 dire need. Tell me how this is a bad thing.

3 Q. What's going on here? Why is Jeff
4 writing this email, if you know?

5 MS. PERRY: Objection. That calls for
6 speculation as to someone's state of mind.

7 MR. O'MALLEY: If you know.

8 A. Well, we discuss everything that comes
9 through like this, and we had discussions on
10 this as I recall as well. This guy was just
11 really -- this is the guy -- he wasn't happy
12 with the way we had set the organization up or
13 how we were running it, what we were doing, and
14 so he was making a stink about the fact that we
15 sold items and made money for it.

16 Q. When you say "we," who are you
17 referring to?

18 A. The Patriot Guard Riders.

19 Q. Okay.

20 A. So the response that we discussed that
21 Jeff should give him is to basically explain
22 things, which it looks like he did. He outlined
23 everything about what the Patriot Guard Riders
24 does and what we do with the money that we

1 receive, and so this paragraph is just a perfect
2 example. He is just lining up all the different
3 things that we were able to do with the money
4 that we bring into the organization and that it
5 funds all these things that only benefit our
6 heroes.

7 Q. Thank you. Okay. You talked earlier
8 that -- you said that at some point in time you
9 became a board member as part of that because
10 Jeff had left the board. Can you tell me about
11 the circumstances leading up to his leaving of
12 the board?

13 A. Yes. Since the inception of the PGR,
14 we had an understanding about the funds that
15 were brought in to the organization, where they
16 came from, where they went, who handled them,
17 and always it was understanding that we were a
18 nonprofit organization and no one in the
19 organization would be profiting from anything
20 that we did. The funds came in. They went
21 right back out and benefited the heroes that we
22 created the organization to protect.

23 At some point -- you know, we weren't
24 making a lot of money. The PGR was not bringing

1 in tons of money, and at some point someone said
2 why not -- well, this is one of the examples.
3 We had people coming out going you-all are
4 making a killing off of things you are selling
5 for the Patriot Guard Riders. Where is that
6 money going? Show us where the money is going.

7 So it just made us take a closer look
8 at the funds that we should have been bringing
9 in and the funds that we were able to account
10 for, and there was a deficit, a large deficit.

11 So as national, we discussed it and --

12 Q. Can I interrupt just for a second?

13 A. Yes.

14 Q. What do you mean by national?

15 A. I'm sorry. National is the national
16 leadership. It's the individuals in the head
17 shed --

18 Q. Okay. Thank you.

19 A. -- about seven or eight of us.

20 We discussed it. We discussed it with
21 Jeff. Jeff basically told us -- not basically.
22 He told us this is how much money the Patriot
23 Guard has made. This is how much I've kept. I
24 recouped the money that I initially put in to

1 start the PGR store. He and his wife put
2 forward the money to start. I'm getting my
3 money back out of it, which I've done, and the
4 rest has gone to the PGR. And he gave us that
5 accounting, and he told us it was 30,000 he kept
6 and 67,000 went to the Patriot Guard.

7 Q. Can I interrupt? What time frame are
8 we talking about here?

9 A. Around this time, it's right around the
10 end -- the fall of 2006 that we really started
11 asking pointed questions because we were all so
12 busy trying to organize our different areas that
13 we just, you know -- whoever is in charge of the
14 money is making a full accounting and so we
15 didn't try to stick our nose into everybody
16 else's business. We just couldn't do that.

17 So it was in the fall of 2006, and then
18 we just started talking amongst ourselves, and
19 when we started talking amongst ourselves, we
20 started realizing we should have been making a
21 lot more money than that.

22 The membership, as this email shows,
23 they knew that we should have been making a lot
24 more money than that. And when we asked Jeff

1 about it, he refused -- we asked him to show us
2 the books. We need to see the books. We need
3 to tell the membership. We need to answer their
4 concerns. They need to know exactly how much
5 we've made. You have told us, but we need to
6 show them something. We need to be able to
7 account for it, show them where our money is
8 going, and he refused to show us. He said he
9 was not going to give us the books, and he
10 wasn't going to show.

11 So then that caused a little conflict
12 with us because then we feel like the president
13 of a nonprofit organization is telling us that
14 no more money is coming in, but we feel like
15 there should be more money coming in, but we
16 have no way to show it and only he does and he
17 won't show us.

18 And so at that point the board members
19 at the time were Jason Wallin, Snap Lines, Bill
20 "Snap" Lines, and Jeff, and at that point they
21 talked to him and said either you're going to
22 have to give us the accounting so that we can
23 set the record straight with the membership,
24 because at this point it had started getting

1 rather crazy. They were losing their tempers
2 and starting to collaborate and point fingers
3 and --

4 Q. Who is that? I'm sorry.

5 A. Membership, various people in the
6 membership. All of a sudden, you know, they all
7 are doing the math, and they started, you know,
8 accusing us of things. And so when he wouldn't
9 give us the books, they told him either you give
10 us the books or you are going to have to step
11 down and the president because we -- it is a
12 conflict of interest in here that there's money
13 in there and it's in the books, but you won't
14 show us the books.

15 So at some point along there I guess he
16 must have told someone -- he did not tell me,
17 but I believe Ronny and Snap -- Ronny Awtry and
18 Snap Lines were doing most of the talking with
19 him, and at some point in there, I think he did
20 say, yes, he was making profit, and that's when
21 the conflict of interest came in.

22 And they said you can't do that if we
23 are a nonprofit, and you haven't divulged that
24 information to the membership. Nobody knows

1 that. So it just wasn't a good scene.

2 Q. Okay. Thank you. Now I am going to
3 introduce or reintroduce Applicant's Exhibit
4 No. 6 from yesterday. Applicant's Exhibit No. 6
5 was produced by Jeff Brown, identified as
6 BROWN009964. Do you recognize this document?

7 A. Yes.

8 Q. Can you tell me what it is?

9 A. This is essentially Jeff's farewell
10 letter, his resignation letter.

11 Q. Okay. And is there a date on it?

12 A. It says it was posted on November 7,
13 2006.

14 Q. When you say posted, what do you mean
15 by that?

16 A. Jeff's Corner is a section on the
17 website where he goes and posts usually monthly
18 updates to the membership, just to let them know
19 he's there, this is what we're doing, just his
20 way of keeping in touch with the membership.

21 Q. Okay. And so looking down in the
22 second paragraph --

23 A. I am going to have to put my reading
24 glasses on. Sorry.

1 Q. The type is a little small here. I
2 will give you a second.

3 A. Okay.

4 Q. Okay. Are you ready?

5 A. Yes.

6 Q. Second paragraph, third sentence, which
7 is on the second line, it starts, "To this end,
8 it is with a very heavy heart that I formally
9 announce my resignation as Executive Director of
10 the Patriot Guard Riders," and then he goes on
11 to say, "This decision was also reached, in part
12 because a handful of very vocal people have
13 expressed concerns over the possible conflict of
14 interest in my owning the PGR Store and being
15 the Executive Director. The business structure
16 of the store has never been hidden and has been
17 discussed 'ad nauseam,' but in an effort to belay
18 any further controversy that takes time and
19 energy away from our missions, I have chosen to
20 step down and close the PGR store after the
21 current inventory is depleted."

22 The first question I have here about
23 this is that he identifies this as a possible
24 conflict of interest in his owning the PGR store

1 and being the executive director. What are your
2 thoughts as to whether this is a conflict of
3 interest?

4 A. Well, my thoughts, which are
5 possibly -- my thoughts are that if you are the
6 president or executive director of a nonprofit
7 organization and you have something within that
8 organization that you are using to make money,
9 making a profit off of, then therein lies the
10 conflict because people were donating money to
11 the organization to help our wounded soldiers
12 and they were buying exclusively items from the
13 Patriot Guard store because they felt that that
14 money was going to the wounded soldiers. It was
15 going to help them, help our cause to do what we
16 did.

17 I know that there were many members who
18 bought, myself included, who bought the bulk
19 items from the store just because it benefited
20 the Patriot Guard Riders even more, and then we
21 would give those items away at missions and
22 such. So to find out that all of this that we
23 were doing as a nonprofit organization, trying
24 to raise money for the organization and the

1 money that was being raised was going into a
2 personal fund for the executive director, that's
3 a conflict.

4 Q. He says here at the end "I have chosen
5 to step down and close the PGR store after the
6 current inventory is depleted."

7 A. Yes.

8 Q. Did you believe that statement?

9 A. Yes, I did.

10 Q. Why did you believe that statement?

11 A. There were lengthy discussions with him
12 about what to do with the store, and we just
13 asked him to leave it, you know, let us continue
14 to run the store and people continue to purchase
15 from the store as the Patriot Guard Riders store
16 because it had always been that. There was no
17 sense in doing anything. Just, you know, walk
18 away.

19 But he didn't want to do that. He was
20 angry and said no, he wasn't -- he wasn't going
21 to do that for us. He wasn't going to do that.
22 So he said I am just going to close it down.
23 And I felt like he was going to do it -- because
24 he was angry, I am going to close the store down

1 and you-all have to fend for yourself.

2 Q. Okay. This document goes on a little
3 further down in the third paragraph here. About
4 midway down, one, two, three, four, five, the
5 sixth line, there is a sentence that says,
6 "After a great deal of pressure, Bill 'Snap'
7 Lines has agreed to assume the position of
8 Executive Director and the board has approved.
9 Snap, thank you for stepping up to the plate,
10 Brother. The PGR is in good hands and I am
11 confident in its leadership."

12 Did you know Bill Lines?

13 A. Yes, I did.

14 Q. What were your impressions of him?

15 A. Snap was probably one of the most
16 honorable men you would meet. Sorry.

17 Q. That's okay.

18 A. He's a very, very, very good man, and
19 even though we were all hurt by what happened
20 here, he stepped up. He continued to support
21 Jeff just in terms of we're going to keep this
22 organization going and we're not going to let
23 this stop. He was the go-between for the rest
24 of head shed and Jeff when all this went down,

1 and although he was very disappointed in Jeff,
2 he was also very supportive that we not throw
3 Jeff under the bus.

4 He's that kind of man. He is honorable
5 and he looks up -- he looks after his fellow
6 guys. And he's not the kind of person that
7 would ever deliberately do anything to hurt
8 someone even though they had done something that
9 had hurt others so much. He's just a good guy.

10 Q. Okay. Is Mr. Lines still alive?

11 A. No. He passed away last year. January
12 was a year ago.

13 Q. And you said he was an honorable man?

14 A. Very.

15 Q. Would he have ever had any reason in
16 your knowledge to state any untruths regarding
17 the Patriot Guard Riders?

18 A. No. Snap was a -- he didn't really do
19 a whole lot of stating because he wasn't very
20 articulate. So he would discuss his issues with
21 the head shed, but Snap's thing was this is who
22 we are. This is what we do. We don't do this.
23 We don't do that. Let's stay focused. Let's
24 keep it simple. Let's just move forward. Even

1 through his disappointment he didn't have
2 anything bad to say about Jeff.

3 MR. O'MALLEY: Okay. Can we take about a
4 five-minute break.

5 (Recess taken.)

6 BY MR. O'MALLEY:

7 Q. Back on the record, please. When Jeff
8 sent this resignation letter as you refer to it,
9 was he on the board of directors at that time?

10 A. No. He was already gone from the board
11 of directors at this time.

12 Q. Can you tell me the process and when
13 that occurred?

14 A. Well, those in head shed were asked to
15 participate in a phone call with Bill "Snap"
16 Lines and Jason Wallin, and we discussed the
17 whole issue, the conflict issue, the different
18 stories we were getting from Jeff as to where
19 the money was or how it was done. And we just
20 felt like there was so much doubt and Jeff
21 wasn't going to voluntarily step down from the
22 board or turn over the store, that they were
23 going to have to take a vote to remove him from
24 office.

1 So we did have a call. Snap and Jason
2 were there, and they invited Ronny, myself, and
3 Ed Mueller to participate. Snap called for
4 Jeff's removal as executive director, and Jason
5 seconded it. Jeff was not on the call. He knew
6 the call was going to take place because they
7 had been talking to him about it, and he was not
8 on the call, and he was removed from his
9 position.

10 Q. So he was removed by a vote from --

11 A. A vote by the board, no confidence
12 vote.

13 Q. Who was the board at that time?

14 A. The board at the time was Jason Wallin,
15 Bill "Snap" Lines, and Jeff Brown, and it just
16 needed a quorum vote, and it got it.

17 Q. So you did not vote?

18 A. I did not vote.

19 Q. Did Ronny Awtry vote?

20 A. No.

21 Q. Did Ed Mueller vote?

22 A. No. We weren't board members.

23 Q. Okay. And then when did you become a
24 board member?

1 A. Later in that call after they did that,
2 then they said we need board members, and we
3 wanted to ask if you guys would be willing to
4 step up and fill Jeff's empty position, and we
5 want to make it a five-man board, and so they
6 asked us if we would serve on the board.

7 Q. All three of you?

8 A. At which time we did.

9 Q. Okay. So then the existing board then
10 was Jason and Snap, and they advised you guys
11 that they wanted to expand to a five-man board
12 and nominated the three of you to come on. So
13 as of that day, there's now a five-man board?

14 A. Yes.

15 Q. And what day is that, if you recall?

16 A. The date that I believe it was was
17 November 5.

18 Q. And that coincides with what you said
19 before, that you agreed to serve for one year?

20 A. One year.

21 Q. And so that was November 5th of 2007?

22 A. 2006, ending 2007.

23 Q. Okay. So why two days later then did
24 Jeff send this resignation letter out?

1 MS. PERRY: Objection. That's speculation.

2 MR. O'MALLEY: To your knowledge.

3 A. Again, there was more discussion
4 after -- as I told you, Snap is a great guy, and
5 he was hurt greatly by the deception, but he
6 also respected Jeff for what he has done, and he
7 had a call with the board and said I want to
8 allow him to resign. We all discussed it. I
9 want to allow him to resign with some dignity,
10 and we're not going to hash this out. It's
11 nothing that we need to put out there publicly.
12 Let's just let him do his resignation and save
13 some face, and we all agreed that that was the
14 right way to go.

15 Q. Okay. After this time period, so you
16 coming on to the board on November 5, Jeff
17 sending a resignation on November 7, what
18 happened in connection with the board in those
19 next -- the days following that?

20 A. Well, as I said earlier, it wasn't very
21 organized. There wasn't any kind of
22 organization, and so all of us were newly in
23 there and were -- well, let's see the books.
24 Let's see what we have. Let's try and put it

1 together, and we couldn't even pull together any
2 kind of real corporate books or documentation,
3 you know. Some of the stuff we couldn't get
4 from Jeff. Some of the stuff Jason had, was
5 going to give it to us.

6 So we just started working pretty
7 feverishly to let's get this organized from here
8 and work down, but we got to get everything in
9 order so that we know what we are looking at.
10 And so we started looking into trying to find
11 all the documentation, you know, our
12 incorporation papers, our trademark papers,
13 everything that we felt or believed had already
14 existed since the PGR was created. And during
15 that time is when we found that they didn't
16 exist, that they had not been prepared. There
17 were none. That's why we could not find them.

18 Q. What was "they" that you're referring
19 to?

20 A. There had been no trademark
21 documentation filed for any of us, for any of
22 who we were. All the representations that we
23 had made in the past to other members about
24 using logos and the name because they were

1 trademarked, there was nothing to support that.
2 We had no documentation that anything had ever
3 been filed. And same with the incorporation
4 papers being incorporated as a nonprofit. The
5 paperwork, 501(c)(3) paperwork, it had been
6 started, but it never got filed. It hadn't been
7 completed. There was a questionnaire that
8 needed to be completed by Jeff and Jason, and it
9 never got completed either.

10 Q. Okay. So with regard to when you found
11 out that trademark applications had not been
12 filed for the logo or for marks, what action, if
13 any, did the board take?

14 A. We had a call right away and determined
15 that we have to get that on file immediately as
16 fast and quickly as we can because we had been
17 operating under this name and we built our
18 organization for over a year now on that name,
19 and we needed to make sure that we protected it.
20 So we appointed Jason to take care of it. He
21 had more of the -- he had started some of the
22 paperwork. He had done some trademarks. He had
23 the initial detail on dates and use and all that
24 jazz. So we asked him to take care of the

1 handling.

2 Q. Now, at the time were you an attorney?

3 A. Was I an attorney?

4 Q. Were you an attorney?

5 A. No.

6 Q. Was anybody on the board an attorney?

7 A. No.

8 Q. At the time of the filing of that
9 trademark application, do you know what Jason's
10 position was in the board?

11 A. At that time I think he was still the
12 treasurer.

13 Q. Okay. Thank you. Now, after the
14 filing of the trademark application by the
15 board, did the board then have further
16 communications with Jeff Brown?

17 A. Not as the whole board, no. I'm not
18 sure -- from the time we filed the trademark?

19 Q. Yes, from the time you filed the
20 trademark moving forward in time.

21 A. Well, we did have phone calls. We did
22 have phone calls, the board did, at which point
23 Ronny and Bill Lines discussed conversations
24 they were having with Jeff about trademark

1 issues.

2 Q. And what was said on those
3 conversations, those board conversation calls?

4 MS. PERRY: Objection. That's asking for
5 hearsay. She doesn't have personal knowledge.

6 MR. O'MALLEY: She was on the conference
7 call.

8 A. During the call we were all told that
9 Jeff felt like he had ownership of the trademark
10 and the logo, the name Patriot Guard Riders,
11 because it was his idea in the beginning and
12 that he was threatening us with legal action if
13 we didn't meet some demands and change the way
14 things were and let him come in and still be a
15 part of it, run his store and such.

16 Q. And so were there concerns on the board
17 about this threatened legal action?

18 A. Well, of course, because we weren't
19 educated in that area. We didn't know what our
20 rights were. We didn't know, you know -- bottom
21 line is we felt like everything belonged to the
22 Patriot Guard Riders because it had always been
23 that way. But now suddenly we are hearing, oh,
24 it's all mine. I did it. I did it. It's in my

1 name, you know. I'm the one who created the
2 logo. I drew the logo or whatever. And then
3 we're like, well, does he have any standing
4 here, or is it the organization's?

5 Q. Okay. I would like to introduce
6 Applicant's Exhibit No. 7 from yesterday. Here
7 is one for you. This is Applicant's Exhibit
8 No. 7, produced by PGR, identified as PGR 002174
9 through PGR 002177. This is a forum posting on
10 the patriotguard.org website, which appears to
11 have been posted by Waldo. Is that correct?

12 A. Yes. That's --

13 Q. And who was that again?

14 A. That is Jason Wallin.

15 Q. And the date of this is?

16 A. 21 November 2006.

17 Q. Okay. So this is approximately two
18 weeks after Jeff's resignation letter?

19 A. Yes.

20 Q. Okay. And if you go down to the
21 signature line here, who appears to have written
22 this statement?

23 A. Snap.

24 Q. Snap. But it also has -- it was posted

1 by Jason Wallin. Why would that have been, if
2 you know?

3 A. Snap was not computer savvy. He had a
4 hard time.

5 Q. Okay. So if we look at this document
6 on the second page, PGR 002175, this is Snap
7 writing this saying, "I would like to address
8 some topics with you and the best way for my old
9 mind is by the numbers. So here goes."

10 When he says "I would like to address
11 some topics with you," who is he referring to
12 there?

13 A. I believe this --

14 MS. PERRY: Objection. That calls for
15 speculation.

16 MR. O'MALLEY: If you know.

17 A. I believe this was aimed at the -- it
18 was to the membership.

19 Q. Can we look at the forum that this is
20 in?

21 A. Yes. It's in the letters from the
22 president. This is like Snap's corner.

23 Q. Okay.

24 A. So it is to the membership.

1 Q. Who could view that corner?

2 A. Everybody.

3 Q. Everybody. No. 1 here, he says, "The
4 PGR store; We are going to TRY and have the new
5 store up by New Years Eve. It will sell all the
6 items it does now and more. And ALL profit will
7 go to the PGR. We are going to outsource this
8 store so that no member will have his hands on
9 it. It will be overseen by a committee of
10 members."

11 When you read that, what is your
12 impression of why he is writing this?

13 A. Well, of course everybody is concerned
14 that we don't have a store now, that it's going
15 to be closed down and we are not going to have a
16 place to get our things. So we did put together
17 a committee of people and said we want you guys
18 to find an independent neutral vendor that can
19 do all of the things that we have done before
20 and set up our new store and new store because
21 the old one is being closed.

22 Q. If we move down to No. 3, it says, "We
23 have received advice from our attorney that we
24 can retain and use our name and logo without

1 restraint. If you want a new logo, let us know
2 but we don't have to."

3 Again, what is your impression of why
4 Snap wrote this?

5 A. Well, I remember when we had our
6 discussion, we did talk to the lawyers that --
7 the lawyers that the organization used and who
8 had been there from the get-go. And we
9 explained it all, the situation where we were
10 at, and we were advised that we had the rights
11 to use the logo and the name on behalf of the
12 organization.

13 Q. Okay. And when did you talk with the
14 lawyers?

15 A. It would have been the days preceding
16 this, of course. Probably just like one day,
17 and in fact honestly my memory is vague, but I
18 am pretty sure I'm the one who talked to them.

19 Q. Okay. And was there a reason why you
20 contacted the attorneys?

21 A. Because Jeff was telling us that he had
22 legal rights, that the organization didn't have
23 rights to use it, and he was doing his cease and
24 desist stuff and saying you have to quit using

1 it because it's mine, mine, mine. And so we
2 called the lawyers that Jeff had actually hired
3 for the organization and asked them, and they
4 told me that it was ours.

5 MR. O'MALLEY: Okay. I would just like to
6 take about a two-minute break to see if I have
7 any further questions.

8 (Recess taken.)

9 BY MR. O'MALLEY:

10 Q. Back on. In connection with what we
11 have been talking about here, did you ever have
12 any personal knowledge that Jeff Brown was using
13 Patriot Guard Riders' mark or logo on his own
14 behalf as opposed to on behalf of the
15 organization?

16 A. No, never.

17 MR. O'MALLEY: Okay. Thank you. No further
18 questions.

19 CROSS-EXAMINATION

20 BY MS. PERRY:

21 Q. Hi. I'm Jenna Perry, and I represent
22 Jeff Brown in Opposition No. 91181448. I am
23 going to ask you a series of questions, and I
24 would like for you to answer them as fully and

1 truthfully as possible.

2 You understand that you are still under
3 oath, correct?

4 A. Correct.

5 Q. So you have a duty to answer each and
6 every question truthfully and fully and with as
7 complete of an answer as you can provide.

8 If anything is confusing, will you tell
9 me?

10 A. Yes.

11 Q. Some of these questions may be
12 redundant, but I ask for your patience and
13 request that you answer each question truthfully
14 and fully as if I asked it for the first time.

15 Have you ever been convicted of a
16 crime?

17 A. No.

18 Q. Have you ever been charged with a
19 crime?

20 A. No.

21 Q. You stated that you were in the
22 military for six years; is that correct?

23 A. Yes, ma'am.

24 Q. Why did your military career end?

1 A. I had a medical discharge for a blood
2 disorder.

3 Q. Is Mr. O'Malley your attorney?

4 A. Yes, he is.

5 Q. You stated that you joined the Patriot
6 Guard Riders in around November of 2005. Is
7 that what you stated?

8 A. Yes, ma'am.

9 Q. Via an email to Twister, Jeff Brown?

10 A. Yes.

11 Q. Was that your first association with
12 the organization?

13 A. Yes.

14 Q. When was your first ride?

15 A. It was mid November, I think, Texas.
16 Most of ours I couldn't attend because they
17 would be 12 hours away. So I don't recall my
18 first, but I believe it was like mid November.

19 Q. You stated earlier in your testimony
20 that someone had asked Jeff Brown to show the
21 books. Do you recall this?

22 A. Yes.

23 Q. Who asked him?

24 A. It would have been Ronny Awtry or Bill

1 Lines. They were the ones communicating with
2 him on behalf of the board.

3 Q. Do you have personal knowledge that
4 they asked Jeff for the books, or did they just
5 tell you that they did?

6 A. They reported back to the board, to the
7 board of directors, what the progress was,
8 trying to get the books, and what his response
9 was.

10 Q. So Jeff Brown never refused to show the
11 books to you; is that correct?

12 A. He refused to show them to the board as
13 a whole, not to me personally.

14 Q. Thank you. What position was Jeff
15 Brown at that time?

16 A. At the time that he refused to show the
17 books?

18 Q. That you allege that he refused to show
19 the books.

20 A. He was a member.

21 Q. Jeff Brown was a member?

22 A. Yes. He had -- he was -- oh, that was
23 right before the removal. So, no, he was
24 president of the organization.

1 Q. Are you aware that anyone asked for the
2 treasurer at the time, Jason Wallin, for the
3 books?

4 A. He did not have the books that we were
5 asking for. Jeff had them.

6 Q. Why did he not have them?

7 A. Because --

8 MR. O'MALLEY: Objection, goes beyond the
9 scope of direct.

10 MS. PERRY: Go ahead.

11 A. They shared responsibility taking care
12 of the books.

13 Q. So you are certain that Jeff Brown had
14 the books and Jason Wallin did not have the
15 books at that time?

16 A. Those particular books, yes.

17 Q. What books are they?

18 A. The books from the proceeds of the
19 store.

20 Q. The books from the proceeds of the
21 store?

22 A. Yes.

23 Q. Okay. Are those the only books you're
24 referring to?

1 A. Yes.

2 Q. Who was in charge of the books for the
3 PGR, Inc., the not-for-profit corporation?

4 A. To be honest, I can't answer that
5 totally to tell you because, as I said, there
6 was confusion as to who had which books, but
7 they shared it. Jason and Jeff handled that
8 portion, so I don't know which one.

9 Q. During your tenure on the board, who
10 kept the books? What board member kept the
11 books of PGR, Inc.?

12 MR. O'MALLEY: Objection, irrelevance, goes
13 beyond the scope of direct, but you can answer.

14 A. My understanding was Jason was the
15 treasurer. My understanding is treasurer should
16 keep the books, but as I stated, there was
17 confusion as to who had which books because they
18 shared that responsibility.

19 BY MS. PERRY:

20 Q. I am talking about only to your
21 personal knowledge during your tenure during the
22 board of directors, who kept the books?

23 A. My personal knowledge is I do not know
24 who had the books.

1 Q. Who would typically have kept the
2 books?

3 A. A treasurer would typically -- my
4 understanding is that a treasurer would keep the
5 books.

6 Q. You stated that you became national
7 captain February 2006; is that correct?

8 A. Correct.

9 Q. Between February of 2005 and February
10 of 2006, can you detail your involvement with
11 the Patriot Guard Riders?

12 A. I was the Texas state captain.

13 Q. Okay. And you became the Texas state
14 captain in February of 2006; is that correct?

15 A. No. I became Texas state captain in
16 November of 2005.

17 Q. Okay. And then you maintained that
18 position till February 2006?

19 A. Yes.

20 Q. What contact did you have with Jeff
21 Brown between November 2005 and February 2006?

22 A. We communicated a lot, often.

23 Q. By?

24 A. Email and telephone.

1 Q. About what?

2 A. Different ways, about how to develop --
3 as the corporation grew, how to develop -- what
4 ideas -- he would ask us for ideas about, you
5 know, writing things for the website, a mission
6 statement, ideas about creating items for the
7 store, ideas about how to set up more
8 organizational systems in the PGR that would
9 make us flow better.

10 Q. Do you know when the not-for-profit
11 corporation paperwork was first filed?

12 A. I do not know the exact date.

13 Q. You stated that you talked
14 personally -- you believe you talked personally
15 to lawyers regarding the trademarks. What
16 lawyers were those?

17 A. It was Winters & King.

18 MS. PERRY: That's all the questions I have.

19 MR. O'MALLEY: Okay. We are done.

20

21 (WITNESS EXCUSED.)

22

23

24

ERRATA SHEET

Pg/Ln	Correction
6 / 9	Change from: Rodriguez
	Change to: Rodriguez, Salcido, and Milam
7 / 12	Change from: 2006
	Change to: 2005
7 / 14	Change from: Excel
	Change to: XL
46 / 22	Change from: Yes.
	Change to: 2006, ending 2007 (clarification)
___ / ___	Change from: _____
	Change to: _____
___ / ___	Change from: _____
	Change to: _____
___ / ___	Change from: _____
	Change to: _____
___ / ___	Change from: _____
	Change to: _____
___ / ___	Change from: _____
	Change to: _____
___ / ___	Change from: _____
	Change to: _____
___ / ___	Change from: _____
	Change to: _____
Signature: _____	Date: _____

1 STATE OF ILLINOIS)
2) SS.
3 COUNTY OF C O O K)


4 I, SUZANNE THALJI, CSR and Notary
5 Public in and for the County of Cook and State
6 of Illinois, do hereby certify that on August 2,
7 2011, at 12:55 p.m., at 150 North Michigan
8 Avenue, Suite 2700, Chicago, Illinois, the
9 deponent BONNIE RUTH PERRY personally appeared
before me.

10 I further certify that the said BONNIE
11 RUTH PERRY was by me first duly sworn to testify
12 and that the foregoing is a true record of the
13 testimony given by the witness.

14 I further certify that the deposition
15 terminated at 2:19 p.m.

16 I further certify that I am not counsel
17 for nor related to any of the parties herein,
18 nor am I interested in the outcome hereof.

19 In witness whereof, I have hereunto set
20 my hand and seal of office this 10th day of
21 August, 2011.

22  
23 Notary Public

24 CSR No. 084-002337 - Expiration Date: 5/31/13

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 6

JEFF'S FINAL CORNER

It's been an exhilarating, but an exhausting year. A year in which we have seen an awakening of the sleeping spirit of America, a rededication to the honor and dignity due all of those who serve our nation, and a uniling of those who have a desire to "do the right thing". Every PGR member should be justifiably proud of being a part of this.

Like all of you, I have taken a huge amount of time away from my family and business over this past year. It's time for me to heed my own words and "Pace Yourself". To this end, it is with a very heavy heart that I formally announce my resignation as Executive Director of the Patriot Guard Riders. This decision was also reached, in part, because a handful of very vocal people have expressed concerns over the possible conflict of interest in my owning the PGR Store and being the Executive Director. The business structure of the store has never been hidden and has been discussed "ad nauseam", but in an effort to belay any further controversy that takes time and energy away from our missions, I have chosen to step down and close the PGR store after the current inventory is depleted.

This has been one of the most difficult decisions of my life. I can't begin to put into words how much pride I have in all of you and what this organization has become and will become in the future. I will always view the founding of the Patriot Guard Riders and having had the honor of being your leader during this formative year as one of the high point of my life. I will continue to be honored to ride with you and stand by you until the day there is no PGR. After a great deal of pressure, Bill "Snap" Lines has agreed to assume the position of Executive Director and the board has approved. Snap, thank you for stepping up to the plate, Brother. The PGR is in good hands and I am confident in its leadership. I'm not going anywhere Folks. I will work closely with National during this transition period and continue to serve the PGR in the capacity as an advisor to the National Board.

Thanks for listening and Salute,

A handwritten signature in black ink, appearing to be 'Jeff', with a stylized, cursive script.

Jeff

posted @ Tuesday, November 07, 2006 8:42 AM by Twister

[Previous Page](#) | [Next Page](#)

[COMMENTS](#)

BROWN009964

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 7



Wednesday, June 18, 2008

Patriot Guard Riders

Standing For Those Who Stood For US



... ALL Forums ...

Code Amber Alert

This is the Code Amber Amber Alert Ticker! - CodeAmber.org neq

Navigation

- Home
- About Us
- Leadership Contacts
- Letters of Appreciation
- Fallen Warrior Scholarship
- ALL Forums
- Help on the HomeFront
- Most Recent Posts
- Photo Gallery
- Media/Press
- Fallen Members
- Events
- Troop Support Partners
- PGR FAQ
- PGR Gear

Patriot Guard Riders Forum

[Unanswered Not Read My Forums Active Topics](#)

Forums > Patriot Guard Riders - National > Letters from the PGR President

Subject: From Soap 21 Nov 06

☐ Email me when someone replies to this thread.
You are not authorized to post a reply.

Author

Waldo •
Posts: 1325
Windsor, Co

Messages

21 Nov 2006 4:54 PM

To the PGR,

The last 10 days have been rough. I feel as if I stepped in it bigtime when I said OK to this job. I've heard from most of you and I've listened to each one. I hope I can serve you well this year. I want to point out that my term is for one year only, then my replacement will be elected by you, the real PGR-the members. More info on that to follow.

Oldest First

Alert

[Forums](#) [My Profile](#) [Search](#) [Members](#)



DiLup Homepage

Directory

Click to send an email to the departments below:

User Support
Moderators

Photos

Media Sightings

Submit Picture of Day

Web Site Administrator

Communications Officer

Letters Of Appreciation

Help On The Homefront

Mission Request

Click on the link below to make initial contact with us regarding honor mission requests:

Contact Us

Contact Arlington National Cemetery

I would like to address some topics with you and the best way for my old mind is by the numbers. So here goes.

1) The PGR store; We are going to TRY and have the new store up by New Years Eve. It will sell all the items it does now and more. And ALL profit will go to the PGR. We are going to outsource this store so that no member will have his hands on it. It will be overseen by a committee of members.

2) Jeff Brown has no affiliation with PGR except as a member. he is being removed as President of the Corp. He will no longer be our registered agent in Oklahoma. That place will be filled by a law firm.

3) We have received advice from our attorney that we can retain and use our name and logo without restraint. If you want a new logo, let us know but we don't have to.

4) The 501C3 is being handled by the attorney, people who have donated will be able to use the tax deduction.

5) By Laws are being prepared by the attorney and will be posted as soon as completed.

6) Our accountant will have all funds reconciled to post within three weeks. They will be posted at that time.

There has been a lot of bile and contention out there this week, most of it justified. But we are trying. You are right, trust is earned and until it is I invite any member to call me (a LOT of you do) and question anything you feel needs clearing up.

Let's try for less anger and spite on the web. If you want to chew me out I would rather you did it on the phone than on the site. I want to do well but I need your help.

Thanks for listening
LLRS

Snap
ICV/MC for PGR

American By Birth
Biker By Choice
Patriot Forever!

Jason Wallin "WALDO"
Deputy Executive Director
Corporate Treasurer
Patriot Guard Riders

Tact and Political Correctness were developed by those who lack the testicular fortitude to say what they really mean!


You are not authorized to post a reply.

Messages


0 Unread Messages

0 Read Messages


ActiveForums 3.6



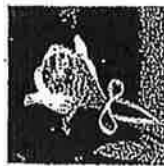
America Loves You Silk Rose



PGR Doo-Rag



PGR Armband



Welcome Home Silk Rose



Wounded Warrior Challenge Coin

Copyright © 2005 -2008 by Patriot Guard Riders Terms Of Use Privacy Statement

Applicant.

Applicant's Exhibit No. 33

Perry, Bonnie

From: Jeff Brown [jeffbrown@valmet.com]
Sent: Friday, February 24, 2006 4:38 PM
To: David240@aol.com; chipe@pobox.com
Cc: Bonnie Cutler; Kurt Mayer; Kevin Smith; Hugh Knaus; Jason Wallin "Waldo"
Subject: RE: Patriot Guard

Chip,

I really hate to do this, but the Patriot Guard Riders cannot allow individual state PGR sites for various legal and administrative reasons. Legally, it opens the door for unauthorized use of the name and logo and sets a precedent that, should it ever be contested, weakens our position against the unauthorized use. Administratively, we have found that information that should be on the national site gets posted to a state site and people begin missing information. I hope you understand.

Thanks,
Jeff Brown "Twister"
Executive Director
Patriot Guard Riders
www.patriotguard.org

-----Original Message-----

From: Chip [mailto:chipe@pobox.com]
Sent: Friday, February 24, 2006 11:27 AM
To: David240@aol.com
Cc: jbrown@patriotguard.org
Subject: Patriot Guard

David,

My name is Chip Elliott and I am the Connecticut State Captain. We have a Connecticut web site which can be found at <http://www.patriotguardct.org>

If you give me permission and send me the information, I will post your name, nickname, city, state and email address (which will be blocked from bots).

Our National Site is the best place to get current information, stay in touch with the National happenings, etc. Our local site will hold all local information such as missions, mission status, etc.

Thank you for your interest, and forward me that information if you wish to become an active member of the CT chapter of PGR.

Chip
Micah 6:8

PGR 002232

6/10/2008

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 35

Perry, Bonnie

From: Jeff Brown [jeffbrown@valornet.com]
Sent: Sunday, November 13, 2005 8:40 AM
To: Charles Yunker; David Howery; William H. Sloan; Ben AKA Tha Whlspanic; Phil Mansker; Art Van Engen "Moker"; Tom Connelly; Terry (Darkhorse) Houck; Adam Taylor; Rich Strothman " Stretch"; Shawn; Lee C. Bussy; Ken McClellan; Michael and Kathleen Gstalter; Ronald Evans; Rev Mike Bass; Frank Pelanek; Redeye530; Randy Cramer "Viking Sun"; Raymond Eade; Ray. Schwartz; Richard Keller; Eric C. Gagomiros; David "Preacher" Slocum; Pete Schullen; Ralph and Susan; Ozarkmark; R. L. Oscar Ingram; Nick Levy; John & Donna Rohloff; Chris Lewis; Ken Gutkowski; Mark Brubaker; Lyle McDaniel; Greg MacDonald "Mac"; LAnnmullins; Kevin Wood; Kay Guynes; Keith Calloway; John Sprague; Jason Wallin; Hugh Knaus; Ruth Allan; Chuck Thompson; Gregg Hansen "Ebay"; George Berry; Wayne Worthington; Erica Stack; David Olsen (STP); Craig Winkler; Everett Freely; Combat Veterans Motorcycle Association; CREGG HANSEN; Chuck Evans; Harry A. Elliott III; Chuck Antolina; Brian & Paola Windham; Bill Carr; Perry, Bonnie; Bill Law; Bill Bradley; Andrew Bruner
Subject: Membership Growing - Urge your friends to join

Hey Folks,

First, a big thank you for getting the word out! Well Done!

The explosion of the Patriot Guard Riders is phenomenal. I'm getting a dozen or more emails each day from patriots wanting to join us and our missions. Many of you have worked very hard to spread the word to your state and national organizations (American Legion, VFW, ABATE, Combat Vets, etc.) and we now have national recognition from many of them.

I know many of you forward our emails to your brothers and sisters in those organizations. This is excellent, it gets the word out to hundreds of patriotic riders very effectively.

Now, as you forward those emails, I would ask you to urge each member of your organization to become a PGR member themselves.

We want our membership to be in the thousands. There are several reasons for this; it gives us more credence when we contact law enforcement, the press, etc. Additionally, in the near future, my plans are to contact various business organizations across the country to garner their support and to provide discounts on goods and services for PGR members. What are your thoughts on this?

Thanks,
Jeff Brown "Twister"
Broken Arrow, OK
Patriot Guard Rider
www.patriotguard.org

Here's the patch

Page 1 of 1

Perry, Bonnie

From: Jeff Brown [twister@patriotguard.org]
Sent: Thursday, June 15, 2006 2:16 PM
To: Bonnie Cutler; head shed
Subject: RE: Here's the patch

Sorry Folks,
This is a "No-Go"...the PGR name is trademarked and cannot be used like this. It does not fit in with the cumulative image we are trying to establish across the nation. Whoever did this did not have permission. This needs to cease immediately.
Jeff

From: Bonnie Cutler [mailto:bonniecutler@earthlink.net]
Sent: Thu 6/15/2006 8:35 AM
To: head shed
Subject: Here's the patch

This is the patch that the PGR members in Minnesota are using. They started using it because there was confusion as to who was PGR and who was other biker groups, and this is what they came up with. No logo so they didn't think it would be a problem. They wear the yellow PGR logo patch on the front.

6/10/2008

PGR 002238

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

JEFF BROWN,

Opposer,

v.

PATRIOT GUARD RIDERS, INC.,

Applicant.

)
)
)
)
)
)
)
)
)

Opposition no. 91181448

Applicant's Exhibit No. 37

James O'Malley

From: Jeff Brown [jeffbrown@valornet.com]
Sent: Tuesday, October 31, 2006 9:39 PM
To: John danner
Cc: head shed; lavendernlace@hotmail.com
Subject: RE: To Answer Why Nevada left the

John,

I'll try to answer your questions to the best of my ability. I ask that you read my answers with a true quest for the truth.

Here's where you can find the June financials posted by Waldo. As they are update by our new accountant, they will be posted:

<http://patriotguard.org/Forums/tabid/61/view/topic/forumid/9/postid/158393/Default.aspx>

It was posted July 19, so, as you can see this information has been available for quite some time.

The Non-Profit status has been posted all over the website...all State Captains (including NV) are aware of that.

Of course there is a treasurer for the PGR. Jason Wallin is treasurer, and during his leave of absence, Jon Tatum has assumed that position.

Yes, the PGR sells stuff... You say that like it's a bad thing. That's how we help finance the organization without any dues. It keeps the website running, it's purchased over 5,000 3X5 American flags and poles for our members to hold in flag lines to honor our fallen heroes, It paid for PGR representatives of the HOTH program to go to Walter Reed Army Medical Center to meet with the medical staff and the national leadership of the American Legion, and to visit the wounded soldiers their. It paid for the Healing Fields at Sturgis, SD, and most recently it sent a \$1,000 check to a wounded soldier and his family who were in dire need. Tell me how this is a bad thing!

Currently we have four national sponsors who have provided some services from time to time to the PGR...not any funds.

I see no need to respond the Dolan issue. It's been hammered to death.

There are no salaried employees of the PGR...period! The only person that receives any monthly compensation from the PGR for services is our outside accountant. We do pay for legal and other types of services when needed.

We have a board of trustees and a national advisory board...you can see all of that on the national leadership contact page.

<http://patriotguard.org/LeadershipContacts/NationalLeadership/tabid/245/Default.aspx>

Let me explain something to you. The PGR is a national organization, not fifty individual state organizations. It's not a "database". It was started by and is run by people all over this nation, people like you, who

9/30/2008

PGR 002999

feel very deeply about the honor and respect due those who serve our country. People who give thousands of hours of their time to make this work and work well. It was not and is not run for profit, fame, or any other such nonsense. Contrary to what you may want to believe, it was not started by the American Legion Riders, and it damn sure wasn't started by the current leaders of the Nevada Patriot Guard. They asked for positions of leadership in the PGR, not the Nevada PGR, and we given that responsibility. As of 48 hours before they broke away, they verbally assured Bonnie Cutler that they were 100% behind the national organization and had no plans to split. If they say otherwise, they are lying. They then abused their positions and access by taking the PGR email list and have used it in an attempt recruit their own members.

John, you are absolutely right about the grassroots membership being the driving force within the PGR. But let me explain something to you. It is the PGR organization and its founders and leaders who started, formed, organized, informed and brought the resources together to make the whole thing happen and keep it happening on a national level. If you don't think your national and state leaders are standing in the flag lines at missions, you are very mistaken. These folks travel more miles and participate in more missions than you can ever imagine. Let's give a little credit where credit is due. The state and national leaders work their butts off. If you think for one minute that the responsibilities surrounding a 60,000 member organization is a walk in the park, you're kidding yourself. I've never worked so hard in my life, and the rest of the national and state leaders do the same.

Calling the PGR a "database" is an insult to every PGR member in the nation, and one of the most absurd accusations I have heard yet.

I have taken a lot of time to answer your questions. I hope I did so to your satisfaction.

Sincerely,
Jeff

P.S. Feel free to forward this email to anyone else who has questions.

-----Original Message-----

From: john danner [mailto:bikerjohnone@hotmail.com]
Sent: Tuesday, October 31, 2006 7:45 PM
To: jeffbrown@valornet.com; lavenderNlace@hotmail.com
Subject: RE: To Answer Why Nevada left the PGR

Thanks for the info.. I didn't know nor have I seen nor heard that PGR is a "legal non-profit(501c3) corporation".. I also have never seen nor am I able to pull up any financial statement of PGR. I'm not a "puter wizard" so it may be my inability but, hopefully, this information is readily and easily accessible to all the 1500 member in Arizona. And, I have asked, flatout, what kind of organization is this with not a word in response.. A database can conduct "hundreds of missions in every state and families write

9/30/2008

PGR 003000

thank you letters" because we, grassroots bikers and veterans, are there in person and they have our "leader's" e-mail addresses. This isn't difficult to understand.. We can agree that there is NO treasure's office in your organization and I know that you, "national", is selling products; I do know that the AZ PGR does sell merchandise at missions, and Louann has said that we have "sponsors" and I asked her: "What do they do and how do they sponsor and support us"? Still no answer.. I do, now, know that Robert Dolan is a "phony" and he did "resign" however he has returned to the missions as a Road Guard and was welcomed by the "leaders".. For me, this is an abomination of our mission.. I don't "know more than you do" because I heard a rumor about Dolan and asked Louann, directly, and she never responded so all I had was a rumor.. And, I know that Dolan was selling PGR merchandise. Please direct and help me find the financial statement so that I am better informed.. As a member of the PGR, are there any salaried positions in the PGR? Is there a board of Directors? I have chosen for whom I will ride and honor, in part, because I cannot afford the time and expense of missions to honor all whom we are attempting to honor and I will not be consumed by this cause or any cause for that matter that comes before my family.. I am retired and have limited funds and even time is limited and spent on other things but I will continue to honor the fallen soldier, support, and shield the families of the fallen.. However, I will not associate with a sonofabitch who says he was a Navy Seal and POW when he was, apparently, neither.. That sickens me to the core.. My four brothers and I served, honorably, (one was killed in Normandy after Omaha Beach) in WWII and Korea.. ALL of us could have avoided the military by claiming our Amish Mennonite conscientious objection to the military and/or bearing arms..

Thanks for the comeback cuz it, at least, gave me some information that I need.. I'm sure you are aware of the need for this organization to be "squeaky clean" to avoid any misunderstanding by the public and especially those we choose to honor and support.. danner

>From: "Jeff Brown" <jeffbrown@valornet.com>
>To: <bikerjohnone@hotmail.com>
>CC: "Bill Lines" <bllines@charter.net>, <lavenderNlace@hotmail.com>, "Head
>Shed" <headshed@patriotguard.org>
>Subject: RE: To Answer Why Nevada left the PGR
>Date: Mon, 30 Oct 2006 17:52:01 -0600
>
>John,
>
>These innuendos are not new. The same tripe has popped up before when
>someone wants to start their own organization.
>
>Finances? Legal Organization? Phonies? I've even seen where the PGR is
>being called nothing but an Oklahoma "database". How does a database
>conduct literally hundreds of missions in every state in the union? Why
>would hundreds of family members write thank you letters to a "database"?
>Come on, let's get real. The PGR membership stands proudly to honor those
>who serve our nation. These members are not a database!
>
>First, the Patriot Guard Riders, Inc. is a legal, non-profit (501c3)
>corporation. All of the documentation is posted in the state captains

9/30/2008

PGR 003001

>forums and SOP's. All SC's and RC's have had access to that for a long
 >time. Those who are saying otherwise are either misinformed or flat lying.
 >Yes, it was set up in Oklahoma. That's where I live and it had to be set
 >up
 >somewhere...makes sense to me.
 >
 >Financials have been posted on the PGR website several times and will
 >continue to be as they are updated. We have now hired an actual accountant
 >with over 20 years experience in non-profit organizations. As a non-profit
 >organization, we are accountable to the IRS and nobody is planning to go to
 >jail.
 >
 >I don't know what "phonies" are leading the PGR. To my knowledge there
 >have
 >been two instances where a PGR members have misrepresented themselves. One
 >was a State Captain and I think one was a ride captain. When discovered
 >and
 >verified, both were relieved of their leadership positions. If you know of
 >others, then you know more than I do. This kind of thing has happened in
 >every organization of any size.
 >
 >As far as missions for anyone other than current KIA's...that's been dealt
 >with a thousand times. If you don't believe in it, don't go. How much
 >simpler can it get? The majority of PGR members do find the others you
 >mention as worthy of an honor mission. If you don't, not a problem,
 >brother...it's a volunteer organization.
 >
 >The PGR is one national organization, not 50 state organizations. After
 >all, it's not the Arizona or Oklahoma military, it's the United States
 >military. We can get more accomplished for our vets and active duty
 >military
 >this way.
 >
 >I find it incredible that trusted PGR state leaders, who held those
 >position
 >of leadership for months and led PGR missions, now have nothing good to say
 >about the same organization they led a few says ago.
 >
 >John, like anyone else, you're free to draw your own conclusions and do
 >whatever you think is right. You, and a lot of other Nevada and Arizona
 >members are being subjected to the same line of misinformation used by the
 >handful of others who, rather than honorably resign their positions and
 >start new organizations from the ground up, chose to spread this crap and
 >in
 >an attempt to influence PGR members to join them. I guess they think it's
 >easier than doing something on their own. I hope you will be able to see
 >through this and make an informed choice.
 >
 >Regardless of your decision, ride safe.
 >
 >Sincerely,
 >Jeff Brown "Twister"
 >Executive Director
 >Patriot Guard Riders
 >www.patriotguard.org

9/30/2008

PGR 003002